

From: Morrison, Tom
Sent: Wednesday, December 09, 2009 10:10 AM
To: Taylor, Jane
Subject: FW: public comments-706A.2-3 eave or cornice vents-exception
Comment

Thomas L. Morrison, Deputy Executive Director
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From: Scott Young [mailto:syoung@stocktonproducts.com]
Sent: Tuesday, December 08, 2009 3:30 PM
To: CBSC (General Mail)
Subject: Fw: public comments-706A.2-3 eave or cornice vents-exception

Attn; Dave Walls

Dave, please find a copy of my "Public Comments" that I sent to Ethan Foote to be included for consideration. Ethan advised me to send them to you as well. Thanks, Scott

----- Original Message -----

From: [Foote, Ethan](#)
To: 'syoung@stocktonproducts.com'
Cc: [Reinertson, Kevin](#) ; 'rgraymer@cbia.org' ; [Ho, Ben](#)
Sent: Wednesday, November 25, 2009 7:19 PM
Subject: e: public comments-706A.2-3 eave or cornice vents-exception

Thanks Mr. Young. Let's communicate Monday about options for comment submittal. =ef=

From: Scott Young <syoung@stocktonproducts.com>
To: Foote, Ethan
Sent: Wed Nov 25 13:23:42 2009
Subject: public comments-706A.2-3 eave or cornice vents-exception

To; Ethan Foote
From; Scott Young-Stockton Products
Regarding; Public Comments on code change 706A.2-3-vent exception

1. We believe that the code change (**706A.2-3 Eave or cornice vents-exception**) supporting/granting the use of 1/16"-1/8" vent holes in continuous soffit vents **strengthens** the code and better supports the intent of the code which states that soffit vents should resist *flame and ember intrusion* (which they do) and makes the code consistent with current national codes. We support this code change.

2. Regarding the Wildland/urban interface designation, we believe that the language of the code needs to better clarify the following since the code is subject to broad interpretation by building officials.

Residential- Differentiate/separate *wildland* residential from *urban* residential. We are aware that there are specific urban/wildland zones designated, however this is still being misinterpreted by building officials.

Commercial- There is no mention of commercial/industrial buildings regarding the use of continuous soffit vents. Our concern is that they can be misinterpreted by building officials as applicable to urban/wildland residential and broadly applied incorrectly, resulting in the denial of their use. We have already had several instances where this has happened. Since continuous soffit vents are used primarily on commercial/retail/industrial buildings away from wildland zones, this needs to be clarified and differentiated to avoid confusion.

3. Continuous soffit vents are a vital component in commercial, retail and industrial buildings for permitting free air movement in soffit and attic spaces and have been used successfully for years and too my knowledge, there has never been an instance where a continuous soffit vent was identified as the sole cause of a fire in a commercial building.

4. Continuous soffit vents are rarely used on residential structures and are unique to commercial construction only. Residential structures have different vent requirements than commercial structures given their design differences and use products/methods unique to this form of construction only. Therefore, commercial and residential structures must be considered/viewed *separately* by the code with each standing on its own merits.

5. While we support any/all product innovation that will help with fire protection in both residential and commercial construction, we do not support companies that seek to, on a self-serving basis, demand that a code change be made and an influential recommendation from fire officials that creates a monopoly for their products. And while these new types of vent have applications in certain types of conditions, structures and locations, they are not applicable in others and therefore cannot be applied broadly across the board as these companies seek to do. Their products are not and should not be considered the only option because they simply are not applicable in every situation.

6. Currently, there has been no official standardized fire test done on these new vent product and that needs to be done as well as testing on existing continuous soffit vents with 1/16"-1/8" vent holes as a comparison.

7. More studies need to be done to determine proper usage/application of both types of vents with factors such as structure type (commercial and residential), size, design criteria, materials and location being considered.

8. The architectural community and builders need adequate time to make appropriate design decisions and evaluate the various options regarding proper venting requirements and product selection.

Should you have any questions or require any additional information, please feel free to contact me. I thank you in advance for your time and consideration.

Sincerely, Scott Young
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