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November 13, 2009

David Wells, Executive Director  
 California Building Standards Committee  
 2525 Natomas Park Drive, Suite 130  
 Sacramento, CA 95833

Dear Mr. Wells,

Gunter Manufacturing is the exclusive manufacturer of the Vulcan Vent products, a series of fire and ember safe vents. We are also a member of the Fire Vent Safety Association (FVSA) and the ASTM.

We respectfully make the following comments on the proposed building code 706A regarding ventilation:

The 2010 proposed code 706A.1, 706A.2 and 706A.3 if enacted as currently printed would create a serious weakening of the current building code as it relates to fire and home safety.

The currently proposed code indicates that if ignition resistant siding is used in construction, then a prescriptive alternative using a standard 1/8" mesh metal eave or soffit vent would be sufficient to protect an attic space from flame and ember intrusion during a wildfire situation. This suggests that the home would be safe (or safer) from building ignition during a wildfire.

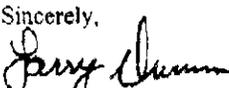
1/8" mesh and other similar size meshes have been shown to fail all known existing testing, including the ASTM WK21343 tests performed at Western Fire Center Inc in Kelso, Washington and by Southwest Research Institute in San Antonio, Texas. Additionally 1/8" mesh has failed testing performed by the National Institute of Science & Technology (NIST). (See conclusion on page 11 of report titled: **ON THE USE OF A FIREBRAND GENERATOR TO INVESTIGATE THE IGNITION OF STRUCTURES IN WILDLAND-URBAN INTERFACE (WUI) FIRES**) Outside of laboratory tests, 1/8" mesh is also known to fail in disastrous wild-fire cases. Reference "Cross Plains, Texas, Wildland Fire Case Study", page 45. Also see page 19 of the Wilderness Ridge Fire Study from Bastrop County, Texas.

In addition to the failure to stop dangerous embers, 1/8" mesh fails to protect sensitive areas from flame or heat intrusion, which again is a weakening of the 2007 code that required eave and soffit vents that resist flame and embers. Every test performed at Western Fire Center and at Southwest Research Institute resulted in 1/8" mesh vents failing to protect ignitable building material on the other side of the vent. Independent tests show the same results with similar mesh vents. See <http://thefvsa.org/Pictures/venttest/venttest.jpg>

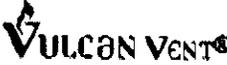
Comments have been made by SMF officials that there should not be any flammable materials stored under the eave including plants, shrubs, fences, firewood, debris, patio furniture or other such items. This line of reasoning is completely unrealistic and dangerous. It will without a doubt end up costing property and lives.

Why is the OSFM allowing California building codes to be weakened in this manner?

To maintain the integrity of the building code, and public safety we respectfully suggest that the existing 2007 Ch 7a wording under 704A.2, A.2.1 & A.2.2 remain in place for the next building code cycle, during which time the ASTM can complete its adoption of WK21343.

Sincerely,  
  
 Larry Dumm

President  
 Gunter Mfg. Inc  
 cc: Kevin Reinertson, Acting Division Chief,  
 Code Development & Analysis, State Fire Marshall's Office

Exclusive Manufacturers of the  **VULCAN VENT®** The Fire & Ember Safe Vent.