

SFM Part 2
K-Berkompas

FAX COVER SHEET

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COMPANY	
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RE	Public Comments

COVER MESSAGE

Public Comments - Ch. 706a 2010 proposed Code Changes

Presented to The Building Standards Commission

November 10, 2009

To Whom It May Concern:

This letter is being written on behalf of Brandguard Vents a member of the Fire Vent Safety Association or FVSA. We are a California Based manufacturing company that has 3 separate manufacturing facilities all located in California. We are proud to say we have been involved with the chapter 7A process since the beginning and get great pleasure knowing that we are helping to develop products that make homes and communities safer from wildfire. Brandguard vents has dedicated significant resources over the past 5 years helping to develop test standards alongside the OSFM, acting as a stakeholder during the code process, helping to educate the building industry on changes to the building code, and working with victims of wildfire to help during the rebuilding process.

At Brandguard Vents we feel obligated to make public comments addressing our concerns with weakening of the chapter 7A vents section. The intent of this letter is to provide the OSFM reasons for rescinding new amendments to 706A in lieu of further study. It is our opinion that a lot of hard work done by a lot of talented and well meaning people could be undone by dangerous new prescriptive alternatives offered up in 706A.

Our concerns include but are not limited to;

Concerns of 2010 proposed language to 706a

- 1) After 5 years and 2 code review cycles just a few short months before the code adoption why were dangerous new prescriptive alternatives added to the code that would allow screen mesh vents back into under eaves cornices and soffits?
- 2) Proposed changes seem to be hasty, cost driven and not in the best interest of building and public safety. What criteria was used to evaluate new prescriptive alternatives?
- 3) How have the Increased risks to structures, life safety, and increased burden to first responders been evaluated?
- 4) Why are we offering Prescriptive Alternatives for mesh vents when most jurisdictions in FHSZ's have outlawed them for close to a decade? (Recall in the past no venting in eaves was allowed at all!)

- 5) Where is the empirical data to suggest that weakening the code with screen mesh vents would be a reasonable prescriptive alternative?
- 6) Has OSFM done an analysis on the cost differences between Safety vents and mesh vents? We are talking about less than ½ of 1% of the total cost to build a home. Each vent is only about \$10-\$30. Despite early rumors that it was \$250ea. It's just about the least expensive thing you can do to make your home safer from a wildfire. The cost issue that is being mentioned is not even an issue!

Review of problem with Mesh vents

- 1) Empirical results- (def.- Verifiable or provable by means of observation or experiment: empirical laws)
 - o Laboratory Tests- Mesh vs. Flame and Ember Vents. 1/8 mesh vents provide no protection against flame and ember exposure. Does the OSFM have data to prove otherwise?
 - o After action wildfire reports list screen mesh vents as a primary cause of structural loss and damage during WUI fires. How would the OSFM justify allowing them again in new construction?

Further study is needed and not dangerous prescriptive alternatives that weaken the code

Other concerned industries in favor of rescinding the 2010 Vent code changes

- Insurance Companies- currently cancelling policy holders with mesh vents. How would the OSFM address this potential insurance issue?
- Fire Professionals, Members of the OSFM have said this issue has been properly vetted to Cal Chiefs. Would they be willing to address the code change at Cal Chiefs next meeting?
- Homeowners, How will the OSFM address Firewise and Firesafe communities about the changes to 704A?
- Government officials, Has the OSFM spent any time educating public officials especially those representing fire prone areas about the changes to the 704A?

At Brandguard Vents we believe further study is needed on this issue along with sensible prescriptive alternatives. Weakening the code is not the answer. Consider this a home built in 2008 in a FHSZ will stand a significantly better chance of surviving a wildfire than a home constructed using the proposed 2010 code if we don't remove this new P.A. . Another issue facing the homeowner in the WUI would be cancellation or the inability to obtain an affordable homeowners insurance policy. Currently in the state of California underwriters for the insurance

companies are using screen mesh vents located in the under eaves and soffits as grounds for policy termination. Again we request further study to be done regarding 7A vents not hasty and reckless prescriptive alternatives.

Sincerely,

Brent Berkompas

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