

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 2, 2009
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: NOVEMBER 16, 2009

Date: Nov 16, 2009

From:

Laura Blaul

Name (Print or type)

(Signature)

-- Orange County Fire Authority / Fire Official on BFO CAC

Agency, jurisdiction, chapter, company, association, individual, etc.

1 Fire Authority Rd Irvine CA 92602

Street

City

State

Zip

I/We (do)(do not) agree with:

[] The Agency proposed modifications As Submitted on Section No.

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [] Held for Further Study [] Approved as Amended

Suggested Revisions to the Text of the Regulations:

SECTION 706A

VENTS

Proposed change is to either 1) delete exception 2; or 2) revise to reinsert performance language or prescriptive language that references vents meeting the performance criteria.

706A.3 Ventilation openings on the Underside of Eaves and Cornices: Vents shall not be installed on the underside of eaves and cornices.

Exceptions:

- 1. The enforcing agency may accept or approve special eave and cornice vents that resist the intrusion of flame and burning embers.*
- 2. Vents complying with the requirements of Section 706A.2 may be installed on the underside of eaves and cornices in accordance with either one of the following conditions:*
 - 2.1. The attic space being ventilated is fully protected by an automatic sprinkler system installed in accordance with Section 903.3.1.1 or,*

2.2. *The exterior wall covering and exposed underside of the eave are of noncombustible material, or ignition-resistant materials as determined in accordance with SFM Standard 12-7A-5 Ignition-Resistant Material.*

Reason: [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

4)The proposed building standards are not unreasonable, arbitrary, unfair or capricious, in whole or in part.
6) The proposed building standards are not unnecessarily ambiguous or vague, in whole or in part.

This comment is submitted under Criteria 4 and 6. The justification for allowing additional means of ember intrusion has not been presented and appears unwarranted as CA continues with record-breaking losses in the WUI. The 2008 “Freeway Complex Fire” that took hundreds of homes provided ample evidence that embers were the main source of home loss. The previous edition of the code required additional protection for attic vents located in particularly vulnerable locations, i.e., the underside of eaves and cornices. These vents were required to “resist the intrusion of flame and burning embers into the attic”. Simply replacing this requirement with the allowance of 1/8” metal mesh without test results attesting to the ability of this provision to prevent ember intrusion at the time of installation and as the home ages, appears to be a step backwards.

There are other ways to build homes and there are vents that appear to meet this requirement. I urge reconsideration of this change in code before we have adequate time to determine what is necessary.