

PUBLIC COMMENT on PROPOSED BUILDING STANDARDS
For Publication in Title 24, California Code of Regulations

See instructions for completing this form on Page 2.

Commenter Contact Information

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Proposed Building Standard

Title 24 Part #: (select one) Part 2.5 Section #: Item #4; R316.XXX

Proposing State Agency Office of the State Fire Marshall

This comment is intended for review during: (select one)
 Code Advisory Committee
 45-Day Comment Period
 15-Day Comment Period
 Commission Meeting

Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)

Approve Disapprove
 Further Study Required Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider. Please use separate pages if your comment does not fit in this space.

The proposed code revisions will reduce building fire safety. Please see attached for detailed comments.

Attachments?

Check if you have attached additional pages. The number of pages attached is: 1

For CBSC Office Use Only Date Received: _____ Rulemaking Item #: _____

October 22, 2018

The Polyisocyanurate Insulation Manufacturers Association (PIMA) was represented on the Phase 1 Office of the State Fire Marshall (OSFM) Work Group. However, PIMA was not invited or permitted to participate in Phase II, witness the testing at Oklahoma State University, or participate in any discussions regarding the development of the proposed standards before or after the BFO Code Advisory Committee meeting. We believe that there is a lack of consensus from all affected parties and that the proposed standards do not meet the AB 127 legislative mandate to explore options without "reducing overall fire safety."

PIMA is opposed to both Items #4 and #17 for the following reasons:

- The proposed standards are in direct conflict with current building standards. The conflicting requirements cannot coexist.
- The proposed standards select one type of building insulation material from an entire class with vague and unenforceable language.
- The proposed standards conflict with national model code requirements, including the current Title 24 building standards.
- The proposed standards do not meet the requirements established in the nine-point criteria for proposals impacting building fire safety. Specifically:
 - The proposed standards conflict with current building standards for other materials.
 - The proposed standards are ambiguous and vague, and are not consistent with current standards.
 - No findings demonstrate that the current standards are deficient or in any way fail to address the goals of the state agencies.
- Finally, the proposed standards do not maintain overall fire safety, and reflect an unwarranted expansion of the original project goals by addressing applications for exterior product applications.

PIMA recommends disapproval of the proposed standards, or the return of the issue to the OSFM for further long-term study (as recommended by the BFO Code Advisory Committee).

Respectfully submitted,



Justin Koscher
President