

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 #: _____
Proposing State Agency Office of the State Fire Marshal
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.

See attached letter on back-side.

Attachments?

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

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

2018-10-03

California Building Standards Commission

2525 Natomas Park Drive, Suite 130

Sacramento, CA 95833-2936

RE: Support for OSFM Proposed changes CRC-Item 4, CBC-Item 17 & CCR: Flammability Standards for Building Insulation Materials

Dear Members of the California Building Standards Commission:

We represent Healthy Building Science Inc., sustainable designers, and environmental consultants who specialize in sustainable and green design. Increasingly, our clients' building requirements include the use of healthy and safe materials and products, which don't contain harmful chemicals whenever possible.

We are writing today to express our support for the California State Fire Marshal's proposal, "Flammability Standards for Building Insulation Materials", which would change the California Building Code, California Residential Code, and California Code of Regulations to permit us to specify polystyrene building insulation without added flame retardants in sub-grade applications.

Flame retardants used in building insulation have been linked to some alarming human health concerns, including neurological and reproductive impairment, cancer, and hormone disruption. These chemicals could affect construction workers, materials manufacturers, and materials handlers, as well as the eventual buildings' occupants. While we design all of our buildings to be fire-safe, we also seek to reduce exposure to toxic chemicals whenever possible. We believe this code change proposal offers a perfect opportunity to meet both of these goals.

A 2017 report by the State Fire Marshal clearly shows that below-grade polystyrene insulation without added flame retardants has comparable fire safety to insulation with flame retardants. Without a fire safety benefit, there is no reason for these toxic chemicals to be added to this material. Removing them from below-grade uses would reduce potential human and environmental harm throughout the lifecycle of the insulation—which would increase public safety.

We are always looking for ways to meet the increasing demand from our clients for products free from chemicals of concern, especially where they do not provide a substantial increase in safety or performance. Our firms would like to have the choice to specify an insulation product that is both safe from fire risks and does not contain harmful flame retardants.

We urge the California Building Standards Commission to approve the OSFM's proposed changes to Flammability Standards in Building Insulation Materials, to allow us the option to choose less toxic materials.

Sincerely, *Alex Stadtner*

Alex Stadtner, President

Healthy Building Science, Inc.

CC: Chief Dennis Mathisen, CA Office of the State Fire Marshal