

**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**

Name:	_____	Date:	_____
Representing:	_____		
Mailing Address:	Number & Street:	_____	
	City:	State:	Zip Code:
	_____	_____	_____
Telephone #:	Email: _____		

**Proposed Building Standard**

Title 24 Part #: (select one)	_____	Section #:	_____
Proposing State Agency _____			
This comment is intended for review during: (select one)	<input type="radio"/> Code Advisory Committee <input type="radio"/> 45-Day Comment Period <input type="radio"/> 15-Day Comment Period <input type="radio"/> 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) <input type="radio"/> Approve <input type="radio"/> Disapprove <input type="radio"/> Further Study Required <input type="radio"/> 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.**

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**Attachments?**

☐ Check if you have attached additional pages. The number of pages attached is: \_\_\_\_\_

**For CBSC Office Use Only** Date Received: \_\_\_\_\_ Rulemaking Item #: \_\_\_\_\_



Civil, Environmental, and Sustainable Engineering  
500 El Camino Real  
Santa Clara, CA 95053

October 6, 2018

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:

I am a professor in the Department of Civil, Environmental, and Sustainable Engineering at Santa Clara University. My group is primarily focused on the analysis, development, and promotion of seismic-resistant and green building technologies. I am writing to express my support for the California State Fire Marshal's proposal, "Flammability Standards for Building Insulation Materials." If approved, this proposal would allow the option to use polystyrene building insulation without added flame retardants below-grade.

Polystyrene is one of the most energy-efficient insulation technologies; however, the addition of flame-retardant chemicals is an environmental and public health concern. A 2017 report by the California State Fire Marshal shows that below-grade polystyrene insulation without added flame retardants has comparable fire safety performance to insulation with flame retardants. Flame retardants have been linked to neurological and reproductive impairment, cancer, and ecosystem toxicity. Since they do not provide a fire safety benefit, builders should be allowed to choose to use polystyrene insulation without these chemicals in below-grade applications.

As a group interested in developing improved structural systems while avoiding adverse impacts on the environment, this code change proposal would allow the option to use a product that is energy-efficient, fire-safe, and less toxic. Additionally, the removal of flame-retardant chemicals from polystyrene could reduce costs in the long-term.

**For these reasons, I urge the California Building Standards Commission to approve the OSFM's proposed changes to Flammability Standards in Building Insulation Materials.**

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Aschheim".

Mark Aschheim, Ph.D., P.E., FACI  
Professor

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