

October 2, 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:

As an architect and engineer, but even more importantly as a parent, I have long advocated for and designed sustainable and green projects for the built environment. (<https://wonglogan.com/>) Environmental sustainability encompasses not only considerations of the health of our planet, but also that of people who live in, work in and visit buildings and their outdoor environments.

Fortunately, many of our clients (including public agencies such as the US Coast Guard, National Park Service, and US Forest Service) have developed building standards and guidelines that promote environmental sustainability.

A significant aspect of environmental sustainability is the use of healthy and safe materials and products with minimal harmful chemical ingredients whenever possible. Hence, I urge your 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 architects and engineers to specify building insulation without flame retardants in sub-grade applications. This is a small yet crucial step in ongoing improvements to the codes.

Your Commission no doubt already has a plethora of scientific studies which show that flame retardants in building insulation have been linked to alarming human health impacts, including neurological and reproductive impairment, cancer, and hormone disruption. Consequently, construction workers, materials manufacturer workers, and materials handlers, as well as the eventual buildings' occupants are routinely exposed to these chemicals. While my firm designs our buildings to be fire-safe, we also seek to reduce exposure to toxic chemicals whenever possible. This code change proposal offers a perfect opportunity to reduce environmental and human harm with a net result of saving lives and quality of life for all.

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, it is insane for such toxic chemicals to be added to this material.

Responsible architects and engineers want to specify insulation products that are both safe from fire risks and free of harmful chemicals such as flame retardants. When such products do not provide a substantial or even any increase in safety or performance, their use not only lines the pockets of the chemical companies while adding to consumers' costs, but also harms the health of countless lives.

**I urge the California Building Standards Commission to approve the OSFM's proposed changes to Flammability Standards in Building Insulation Materials, allowing an option for less toxic materials.**

Sincerely,



Marcy Wong, Partner MARCY WONG DONN LOGAN ARCHITECTS  
LEED AP California Professional Engineer C - 30981 and California Registered Architect C - 15547

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