

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Aaron R. Phillips
Date: Thursday, October 7, 2021 6:39:45 AM

Commenter Contact Information

Name: Aaron R. Phillips

Date: 10/7/2021 12:00:00 AM

Representing: Asphalt Roofing Manufacturers Association (ARMA) Mailing Address Number and

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Proposed Building Standard

Title 24 Part #: Part 2.5

Section #: Chapter 3, Section R337.6

Proposing State Agency: SFM

This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):

Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). 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.

The Asphalt Roofing Manufacturers Association (ARMA) supports the replacement of Section R337.6.2.1 in Chapter 3 (Building Planning), Section R337 (Materials and Construction Methods for Exterior Wildfire Exposure) of the California Residential Code, as proposed in Item 3-10 of SFM 05-21 45Day ET-Pt25 with new language. This is an important change necessary to improve the code by providing a compliance path for rooftop vents.

Existing code language requires vents to be listed in accordance with ASTM E2886. However, the scope of that standard excludes "Roof ridge and off-ridge (field) vents." The proposed new language fills an important gap in the existing code by establishing an ember resistance requirement for rooftop (i.e., ridge and off-ridge) vents. This proposed change is especially important in satisfying Building Standards criteria number 3 by addressing a critical fire safety public interest. ARMA encourages acceptance of this change to Section R337.6.2.1.

ARMA suggests a minor amendment to the proposed language of Section R337.6.2.1—removal of the phrase "in diameter." Mesh used in these applications may contain openings that are square, rectangular, circular, or some other shape. Removal of the phrase, "in diameter," will improve the language and eliminate the implication that only circular shaped openings are permissible.

9 Point Criteria Info:
18930(a) 3