

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS; aphillips@asphaltroofing.org
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Aaron R. Phillips
Date: Wednesday, May 3, 2023 1:04:48 PM

Commenter Contact Information

Name: Aaron R. Phillips

Date: 5/3/2023 12:00:00 AM

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Proposed Building Standard

Title 24 Part #: Part 2

Section #: Chapter 7A, Section 705A.1

Proposing State Agency: State Fire Marshall 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.

SFM 02/22, ITEM 7-2.

Section 705A.1 General.

ARMA generally supports the proposed revisions to Section 705A.1 to align provisions with Health and Safety Code Section 13132.7. However, removal of the words “fire retardant” from the final sentence of Section 705A.1 is recommended. Although these are the words used in Health and Safety Code Section 13132.7, use within the California Building Code is not advisable because usages of “fire retardant” throughout the California Building Code always relate to wood products. Inclusion of “fire retardant” in Section 705A.1 may create misunderstanding and misinterpretation of acceptable roof covering products, which are any that meet a Class A fire classification when tested in accordance with ASTM E108 or UL790. These include multiple roof covering types, not just those composed of wood.

We recognize there are existing instances of “fire retardant” employed in a similar fashion (e.g., CBC 1505.1.1, which is proposed for removal per Item 11-1 of SFM 02/22, and CBC 1505.1.2) and we encourage the State Fire Marshal to address these during the Triennial Code Adoption cycle.

Nevertheless, existing instances do not justify incorporation of “fire retardant” in Section 705A.1.

This recommendation is based on Health and Safety Code Section 18930(a)(6), with an intent to

reduce ambiguous and vague language in the proposal.

9 Point Criteria Info:

18930(a) 6