

**From:** [DGS Website@DGS](mailto:DGS_Website@DGS)  
**To:** [CBSC@DGS](mailto:CBSC@DGS); [aphillips@asphaltroofing.org](mailto:aphillips@asphaltroofing.org)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Aaron R. Phillips  
**Date:** Wednesday, May 3, 2023 1:23:40 PM

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#### Commenter Contact Information

Name: Aaron R. Phillips

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

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

Street: 2331 Rock Spring Road

City: Forest Hill

State: MD

Zip Code: 21050

Telephone #: 6202020922

Email: [aphillips@asphaltroofing.org](mailto:aphillips@asphaltroofing.org)

#### Proposed Building Standard

Title 24 Part #: Part 2.5

Section #: Chapter 3, Section R337.5.1

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 03/22, ITEM 3-1

Section R337.5.1 General.

ARMA generally supports the proposed revisions to Section R337.5.1 to align provisions with Health and Safety Code Section 13132.7. However, removal of the words "fire retardant" from the final sentence of Section R337.5.1 is recommended. Although these are the words used in Health and Safety Code Section 13132.7, use within the California Residential Code is not advisable because usages of "fire retardant" throughout the California Residential Code always relate to wood products. Inclusion of "fire retardant" in Section R337.5.1 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., CRC R902.1.1, which is proposed for removal per Item 6-2 of SFM 03/22, and CRC R902.1.2) 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 R337.5.1.

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