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Subject: 45-day and 15-day Public Comment Periods

Date: May 5, 2026

To the California Building Standards Commission,

I appreciate the opportunity to provide comments on the proposed amendments to Section 504.10.1, Vent Testing, included in the 45-Day Express Terms under SUB-ITEM 4-12. After reviewing the proposed language, I would like to respectfully present the following public comment that provides additional clarification which may be beneficial to support consistent interpretation and application of vents tested in accordance with ASTM E2886.

#### **SUB-ITEM 4-12 [Proposed Language of Public Comment]**

**504.10.1 Performance requirements Vent testing.** Ventilation openings shall be fully covered with ~~Wildfire Flame and Ember Resistant vents approved and listed by the California State Fire Marshal, or WUI vents tested~~ and listed in accordance with ASTM E2886, to demonstrate compliance with all the following requirements:

1. There shall be no flaming ignition of the cotton material during the Ember Intrusion Test of ASTM E2886.
2. The Flame Intrusion Tests of ASTM E2886 shall be conducted in both the horizontal and vertical orientations.
- 2.3. There shall be no flaming ignition during the Integrity Test portion of the Flame Intrusion Test.
4. The maximum temperature of the unexposed side of the vent shall not exceed 662°F (350°C).

**Rational:** The proposed language striking “Wildfire Flame and Ember Resistant vents approved and listed by the California State Fire Marshal” would remove the requirement for tested products to be listed. As noted in the Initial Statement of Reasons presented by the State Fire Marshal, vents addressed in Section 504.10.1 should be tested and listed in accordance with ASTM E2886. Listing a product with the California State Fire Marshal, or another accredited listing agency, provides an important quality assurance mechanism by verifying continued compliance with the test standard through ongoing product inspections. These third-party inspections help ensure that products being manufactured and sold remain consistent with the

specifications, quality, and construction methods of the product that was originally tested.

Sincerely,

Slate Bryer