Comments on Wildfire Safety Advisory Board Recommendations

From: Murdoch, Jay <Jay.Murdoch@owenscorning.com>

Sent: Monday, April 13, 2020 10:29 PM **To:** Wildfire Safety Advisory Board

Cc: Murdoch, Jay

Subject: Fire Hardening of Homes & Buildings on Sites - Recommendations on the 2020 Utility

Wildfire Mitigation Plans

Hello – does the scope of application AB 1054 <u>preclude</u> the CPUC and utilities to develop a recommendation that CALFire, HCD, the CBSC and other agencies with jurisdiction over the codes that apply to new and existing buildings begin to take more urgent action to improve the CA WUIC, the CA Bldg and CA Residential Code to require the use of non-combustible sidings and trims on homes and buildings, and mandate Class A roofing be used?

At a minimum, the CPUC should direct the utilities to ensure that rebate and incentive program funds tied to energy efficiency and for wildfire rebuild are not being used to allow combustible materials building materials to be used. This should apply to the CAHP program for new homes as well.

The entire wildfire debate in California has been on forests, vegetation, and utility infrastructure. There has been no focus and attention on fire hardening of homes and buildings. Fires do not know to stop at a property line, or after it burns through the vegetation on a site before it impacts the home or building.

If the scope of AB 1052 does not specifically limit or constrain the CPUC and Wildfire Advisory Board recommendations from including strong language identifying this gap as a significant flaw in the wildfire debates in California, then we ask that the WSAB's final recommendations include encouragement to CALFire (Office of the State Fire Marshal), HCD, and the CBSC to initiate rulemaking to improve the CA codes and develop a set of above code minimum best practices for fire hardening homes and buildings.

Respectfully,

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