



SF Environment

Our home. Our city. Our planet.

A Department of the City and County of San Francisco



September 9, 2015

RE: Support for Public Comments to FS 170-15 and FS 171-15 proposals

Dear International Code Commission Voting Representative:

The San Francisco Fire Department and San Francisco Department of the Environment are pleased to support approval of FS 170-15 and FS 171-15 as modified by Public Comments.

We have long been interested in providing real and effective fire safety while reducing exposure to toxic chemicals. We believe it is in the best interest of first responders as well as building occupants that the building code not perpetuate the unnecessary use of harmful or potentially harmful chemicals.

Subgrade foam plastic insulation provides an opportunity where safer, healthier insulation materials can be used without compromising fire safety. Since there is no oxygen and no ignition source between the ground and a concrete or masonry slab or foundation, the use of fire retardants in subgrade foam insulation is unnecessary.

That is why the San Francisco Department of the Environment and the San Francisco Fire Department support and are co-commenters on proposals FS 171-15 and FS 170-15. These proposed code changes would not ban fire retardants in subgrade foam plastic insulation, but would provide a choice of safely producing and using subgrade foam plastic insulation with or without chemical fire retardants. We believe there is demand for such materials in San Francisco and beyond.

We urge you to cast your supporting votes for FS 170-15 and FS 171-15 so that we may reduce exposure to unnecessary toxic chemicals while ensuring fire safety.

Sincerely,

Joanne Hayes-White
Chief

San Francisco Fire Department

Deborah O. Raphael
Director

San Francisco Department of the Environment