



STATE OF GEORGIA
DEPARTMENT OF AGRICULTURE

Gary W. Black
COMMISSIONER

January 21, 2021

Commissioner Christopher Nunn
Georgia Department of Community Affairs
60 Executive Park South NE
Atlanta, GA 30329

Dear Commissioner Nunn,

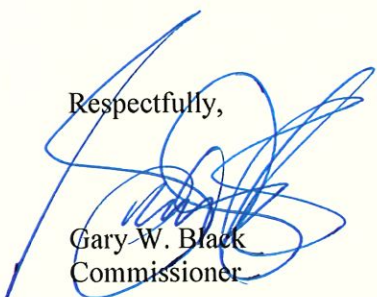
I hope this letter finds you well! Please consider the following information regarding spray foam as this process moves forward within our two departments. Many good people have worked to bring this issue to a positive resolve for consumers in Georgia. Thank you for taking the time to review this information.

It is my understanding that The Georgia Structural Pest Control Commission (GA SPCC) has provided the Georgia Department of Community Affairs with a code amendment for section R402.2.9 referencing specifically, the foundation and framing interface of crawl space and basement construction. The focus of the proposed change is to ensure this area is air sealed and insulated in such a way to allow pest management companies to visibly see and inspect the wood in this area. In most cases when spray foam is being applied this area it is being air sealed and insulated by covering it completely with spray foam insulation, leaving no way to visibly see and inspect the area for termites. With this in mind, hundreds to thousands of homes will ultimately lose their termite guarantees and coverages, that have been protecting Georgians homes for over 70 years.

I have been aware of how spray foam insulation can impact the ability to inspect for termites in a structure since 2018 and feel that changes must be made to help protect homeowners in Georgia. Subterranean termites cost U.S. homeowners billions of dollars a year for termite control and damage repair. The threat to homes and other structures by subterranean termites is greater in the Southeast, and Georgia lies in the middle of what is commonly referred to as the "termite belt". The most important component of any pest management program is the inspection, and pest management professionals must be able to visibly see areas of the structure where termites are most likely to be present. When these areas are not visible, live termites and evidence of their presence may remain undetected and could ultimately void pest control contracts.

The GA SPCC's proposal allows for homeowners in Georgia to take advantage of the energy efficiencies, spray foam provides and protect their home from termite damage. I fully support the recommended changes and thank you for your time and consideration.

Respectfully,



Gary W. Black
Commissioner

CC: Mr. Ted Miltiades, Georgia Department of Community Affairs
Mr. Gregori Anderson, Chairman State Codes Advisory Committee
Mr. Daniel Baiamonte, State Codes Advisory Committee
Mr. Bill Chambless, State Codes Advisory Committee
Mr. Mike DeLaigle, State Codes Advisory Committee
Mr. Bill Duck, State Codes Advisory Committee
Mr. Stan Everett, State Codes Advisory Committee
Mr. Dwayne Garriss, State Codes Advisory Committee
Mr. William Guinade, State Codes Advisory Committee
Mr. James Martin, State Codes Advisory Committee
Mr. John Hutton, State Codes Advisory Committee
Mr. Robert Maddox, State Codes Advisory Committee
Mr. Windell Peters, State Codes Advisory Committee
Ms. Elaine Powers, State Codes Advisory Committee
Mr. Bob Qurnell, State Codes Advisory Committee
Mr. Maurice Redmond, State Codes Advisory Committee
Mr. Vance Robinson, State Codes Advisory Committee
Mr. Joel Rodriguez, State Codes Advisory Committee
Mr. Chad Shaw, State Codes Advisory Committee
Mr. Ryan Taylor, State Codes Advisory Committee
Mr. Jerry Wainright, State Codes Advisory Committee
Mr. Tim Williams, State Codes Advisory Committee
Mr. Derrick Lastinger, Georgia Department of Agriculture