

COMMISSION ACTION MATRIX -- YELLOW

**2022 CALIFORNIA FIRE CODE, TITLE 24, PART 9 (2021 INTERNATIONAL FIRE CODE)
 AGENCY: OFFICE OF THE STATE FIRE MARSHAL (SFM 06/21)**

LEGEND:

CAC Actions: Approve, Disapprove, Approve as Amended, Further Study Required

Agency Responses: Accept, Disagree, Withdraw

CBSC Actions: Approve, Disapprove, Approve as Amended, Further Study Required

Matrix Paper Color (for commission action only): GREEN = uncontested items, YELLOW = challenged items, SALMON = withdrawn, no action required

BUILDING, FIRE, AND OTHER CODE ADVISORY COMMITTEE

CHAPTER 2 -- DEFINITIONS

SFM proposes to adopt Chapter 2 of 2021 IFC and carry forward existing amendments from 2019 CFC, with additional modifications as listed below.

Item Number 2	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-2-28	<i>Photovoltaic (PV) Support Structure, Elevated</i>	Approve	Accept	45-Day Comment: B. Davis, CSSA J. Cain, SEIA Further Study.	Add definition. Comment regarding the consideration of the applicability of the defined term in Part 9.	

CHAPTER 3 – GENERAL REGULATIONS

SFM proposes to adopt sections of Chapter 3 of the 2021 IFC and carry forward existing amendments from 2019 CFC, with additional modifications as listed below:

Item Number 3	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-3-7.1*	<i>322.4.2.3 Fire protection systems.</i>	Approve	Accept	45-Day comment: C.F. Francis, Tesla, Inc. Approve as Amended, Criteria 3	Adopt new amendment: Comment based on storage areas that meet Section 322.4.2.6 to consistently align with Chapter 32 of the CFC. * CAM renumbering.	

Item Number 3	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-3-7.2*	322.4.2.4 Fire alarm systems.	Approve	Accept	45-Day comment: C.F. Francis, Tesla, Inc. Approve as Amended, Criteria 3	Adopt new amendment: Comment regarding allowance for other detection methods and alternatives for constantly attended locations. * CAM renumbering.	
SFM 06-21-3-7.3*	322.4.3 Outdoor Storage.	Approve	Accept	45-Day comment: C.F. Francis, Tesla, Inc. Approve as Amended, Criteria 3	Adopt new amendment: Commenter suggests adding an exception for outdoor storage areas under weather protection and where fully protected by sprinklers. * CAM renumbering.	
SFM 06-21-3-7.4*	322.4.3.3 Fire detection.	Approve	Accept	45-Day comment: C.F. Francis, Tesla, Inc. Approve as Amended, Criteria 3	Adopt new amendment: Commenter suggests Commenter suggests revising proposed language to allow other suitable detection options for exterior storage. * CAM renumbering.	

CHAPTER 11 – CONSTRUCTION REQUIREMENTS FOR EXISTING BUILDINGS

SFM proposes to adopt Chapter 11 sections of the 2021 IFC and carry forward existing amendments from 2019 CFC, with additional modifications as listed below:

Item Number 11	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
(11-1A*)	1107 ENERGY STORAGE SYSTEMS.	*	*	45-Day Comment: R. Davidson, Davidson Code Concepts Approve as Amended, Criteria #3	*CAM renumbering. 2021 IFC Section 1107 was not originally proposed for adoption in the Express Terms. Commenter suggests adding approved language for the 2024 IFC.	
(11-1B*)	1107.1 Lithium-ion technology energy storage systems.	*	*	45-Day Comment: R. Davidson, Davidson Code Concepts Approve as Amended, Criteria #3	*CAM renumbering. Language not originally part of the Express Terms. Commenter suggests adding approved language for the 2024 IFC.	
(11-1C*)	1107.1.1 Early detection.	*	*	45-Day Comment: R. Davidson, Davidson Code Concepts Approve as Amended, Criteria #3	*CAM renumbering. Language not originally part of the Express Terms. Commenter suggests adding approved language for the 2024 IFC.	

Item Number 11	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
(11-1D*)	1107.1.2 Corrective action plan.	*	*	45-Day Comment: R. Davidson, Davidson Code Concepts Approve as Amended, Criteria #3	*CAM renumbering. Language not originally part of the Express Terms. Commenter suggests adding approved language for the 2024 IFC.	

CHAPTER 12 – ENERGY SYSTEMS

SFM proposes to repeal many sections in Chapter 12 2019 CFC. SFM also proposes to adopt Chapter 12 of the 2021 IFC and carry forward existing amendments from 2019 CFC, with additional modifications as listed below:

Item Number 12	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-12-10.1*	1207.1.4 Hazard mitigation analysis.	Approve	Accept	45-Day Comment: S. Lang, Honeywell Approve as Amended, Criteria #3. C. Picard, Tesla Inc. Support comment, Approve.	Repeal amendments in 1206/1207 and Adopt Model. S. Lang comments suggest revising proposed language regarding model code conditions. * CAM Numbering adjusted to allow for Commission actions on related items.	
SFM 06-21-12-10.2*	Table 1207.6	Approve	Accept	45-day Comment: S. Lang, Honeywell Approve as Amended, Criteria #3. C. Picard, Tesla Inc. Support comment, Approve.	Repeal TABLE 1206.6. Adopt Model Table 1207.6. Commenter suggests revisions to Table regarding ventilation and thermal runaway. *CAM renumbering.	
SFM 06-21-12-10.3*	1207.6.1.2.4 Gas detection system.	Approve	Accept	45-day Comment: S. Lang, Honeywell Approve as Amended, Criteria #3. C. Picard, Tesla Inc. Support comment, Approve.	Carry forward amendments, repeal and replace with model code text. Commenter suggests adding item #3. *CAM renumbering.	
SFM 06-21-12-11.1*	1207.11.4 Energy ratings.	Approve	Accept	45-Day Comment: B. Davis, CSSA J. Cain, SEIA Approve as Amended.	Commenter suggests adding basements to item 1, and possible conflicts with 2019 CFC Supplement. * CAM renumbering.	
SFM 06-21-12-12	1207.11.6 Fire detection.	Approve	Accept	45-Day Comment: B. Davis, CSSA J. Cain, SEIA Approve as Amended.	Carry forward amendments, repeal and replace with model code text. Comments on #1 and #2.	

Item Number 12	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-12-13.0*	1207.11.7 Protection from impact.	Approve	Accept	45-Day Comment: B. Davis, CSSA J. Cain, SEIA Approve as Amended.	Amend sections. Commenter suggests editorial updating to match language approved for the 2024 International Fire Code. * CAM Numbering adjusted to allow for Commission actions on related items.	

CHAPTER 49 -- REQUIREMENTS FOR WILDLAND-URBAN INTERFACE FIRE AREAS

SFM proposes to bring forward and add new amendments to Chapter 49 as listed below

Item Number 49	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-49-1	User note:	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended. 15-Day comment: C. Ochoa, R. Raymer California Building Industry Association (CBIA) Disapprove, Criteria #4	SFM proposes a User Note to be added as a commentary for Chapter 49. Commenter suggests revising the User Note to align with recently chaptered legislation. CBIA recommends SFM Withdraws its proposed 15-day revised amendment for this section.	
SFM 06-21-49-3	4901.2 Purpose.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended. 15-Day comment: C. Ochoa, R. Raymer California Building Industry Association (CBIA) Disapprove, Criteria #4	Amend existing subsection. Suggestion to Amend the Purpose to clearly describe SRA and LRA conditions within this chapter. CBIA recommends SFM Withdraws its proposed 15-day revised amendment for this section. The SFM has withdrawn the 15-Day proposed language related to the Local Responsibility Areas for fire severity zones. Refer to FSOR.	

Item Number 49	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
(49-4A*)	FIRE HAZARD SEVERITY ZONES.*	*	*	* 45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	* Defined term was not a part of original Express Terms. Commenter suggests revising existing defined term to align with statute. Refer to original comments. CAM renumbering.	
(49-4B*)	FUEL.*	*	*	* 45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	* Defined term was not a part of original Express Terms. Commenter suggestion to introduce a new defined term to align with statute. CAM renumbering.	
(49-4C*)	VEGETATION.*	*	*	* 45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	* Defined term was not a part of original Express Terms. Commenter suggestion to introduce a new defined term to align with statute. CAM renumbering.	
SFM 06-21-49-13	4903.2 Contents.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Commenter suggests revision to refer to Title 14, CBC and CRC sections.	
SFM 06-21-49-16	4903.2.1.2 Final Fire Protection Plan.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Commenter suggests adding item d regarding identification of existing vegetation.	
SFM 06-21-49-17	4904.1 General.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Amend existing subsection. Commenter suggests editorial revision changing the term Director to State Fire Marshal.	
SFM 06-21-49-18	4904.2 Classifications.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Amend existing subsection. Commenter suggests editorial revision changing the term Director to State Fire Marshal.	
SFM 06-21-49-19	4904.3 Local Agency Requirements.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Commenter suggests deleting proposed language and re-printing portions of the actual provisions of state law.	

Item Number 49	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-49-20	4904.3.1 Local Agency Ordinances.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Commenter suggests deleting proposed language and subsection. Suggestion to re-print portions of the actual provisions of state law.	
SFM 06-21-49-21	4904.3.2 Local Agency Discretion.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Commenter suggests deleting proposed language and subsection. Suggestion to re-print portions of the actual provisions of state law.	
SFM 06-21-49-22.1*	4905.3 Establishment of limits.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended. 15-Day comment: C. Ochoa, R. Raymer California Building Industry Association (CBIA) Disapprove, Criteria #4	Amend existing subsection. * Suggestion to revise section to align with provisions of state law. CAM renumbering. CBIA recommends SFM Withdraws its proposed 15-day revised amendment for this section. The SFM has withdrawn the 15-Day proposed language related to the Local Responsibility Areas for fire severity zones. Refer to FSOR.	
SFM 06-21-49-23.3*	4906.3.1 Contents.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection heading and text. Suggestion to revise proposed language in Items 1, 5 and 6. *CAM renumbering.	
SFM 06-21-49-23.4*	4906.4 Vegetation.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection heading and text. Suggestion to revise proposed language in Item number 2. *CAM renumbering.	
SFM 06-21-49-23.5*	4906.4.1 Shrubs.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection heading and text. Suggestion to revise proposed language to refer to CCR Title 14 and to delete items 1 through 4. *CAM renumbering.	

Item Number 49	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-49-23.6*	4906.4.2 Trees.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection heading and text. Suggestion to revise proposed language in item 2. *CAM renumbering.	
SFM 06-21-49-24.1*	4907.1 General.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Amend existing subsection text. * Suggestion to revise proposed language. CAM renumbering.	
SFM 06-21-49-24.2*	4907.2 Application.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection heading and text. * Suggestion to revise proposed language. CAM renumbering.	
SFM 06-21-49-24.3*	4907.3 Requirements.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection heading and text. * Suggestion to revise proposed language. CAM renumbering.	
SFM 06-21-49-25.2 *	4908.2 Subdivision Map Findings.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection heading and text. Comment suggests revising proposed language. * CAM renumbering.	
SFM 06-21-49-26.0*	SECTION 4909 SUBDIVISION REVIEW SURVEY	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add Section 4909 and subsections. * Suggestion to delete proposed language in 4909.1, 4909.2, 4909.3 and 4909.4. Suggestion is to include re-printed portions of Public Resources Code (PRC) Section 4290.5 to align with current statute. CAM Numbering adjusted to allow for Commission actions on related items. Refer to original comments.	
SFM 06-21-49-26.1*	4909.1 Subdivision identification.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Suggestion to delete proposed language and subsection 4909.1. * CAM renumbering. Refer to original comments.	

Item Number 49	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-49-26.2*	4909.2 Fire Safety Recommendations.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Suggestion to delete proposed language and subsection 4909.2. * CAM renumbering. Refer to original comments.	
SFM 06-21-49-26.3*	4909.3 Implementation.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Suggestion to delete proposed language and subsection 4909.3. * CAM renumbering. Refer to original comments.	
SFM 06-21-49-26.4*	4909.4 Re-survey.	Approve	Accept	45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. Suggestion to delete proposed language and subsection 4909.4. * CAM renumbering. Refer to original comments.	
(49-27A*)	4910.1.1 Emergency evacuation.*	*	*	* 45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	* Not a part of originally proposed Express Terms. Commenter suggestion for new section to align with statute. Not reviewed at CAC or at 45-Day. CAM renumbering. Refer to original comments.	
SFM 06-21-49-27.2*	4910.2 Submission to the BOF . . .	Approve	Accept	* 45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. * Commenter suggests deleting proposed language in subsections 4910.2, 4910.3, 4910.4, and re-printing portions of the actual provisions of state law, GC Section 65302.5(b). CAM renumbering. Refer to original comments.	
SFM 06-21-49-27.3*	4910.3 Review by the BOF . . .	Approve	Accept	* 45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. * Commenter suggests deleting proposed language and subsection 4910.3. Refer to original comments. CAM renumbering.	

Item Number 49	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-49-27.4*	4910.4 Adoption of the Safety Element.	Approve	Accept	* 45-Day Comment: M. Araghi, Ventura County Fire District Approve as Amended.	Add new subsection. * Commenter suggests deleting proposed language and subsection 4910.4. Refer to original comments. CAM renumbering.	

CHAPTER 80 – REFERENCED STANDARDS

SFM proposes to adopt Chapter 80 of the 2021 IFC and carry forward existing amendments from 2019 CFC, with additional modifications.

Item Number 80	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-80-21	Adopt UL 9540 Edition 2-2020	Approve	Accept	45-Day Comment: B. Davis, CSSA J. Cain, SEIA Approve as Amended.	Update and amend UL 9540 -2016 to UL9540 <i>Edition 2, 2020</i> . Comment regarding Edition reference.	
SFM 06-21-80-22	Adopt UL 9540A Edition 4 2019	Approve	Accept	45-Day Comment: B. Davis, CSSA J. Cain, SEIA Approve as Amended.	Update and amend UL 9540A-17 to UL9540 <i>Edition 4, 2019</i> . Comment regarding Edition reference.	

APPENDIX P – COMMUNITY WILDLAND-URBAN INTERFACE (WUI) FIRE HAZARD EVALUATION FRAMEWORK

SFM does not adopt 2022 CFC *Appendix P*.

Item Number P-1	Code Section	CAC Action	Agency Response	Public Comments	Annotations	CBSC Action
SFM 06-21-P-1	APPENDIX P	Approve	Accept	45 Day: A. Yoshida, Parraid, LLC Approve as Amended, Criteria #3. B. Winholtz, National Institute of Standards and Technology (NIST). Support comment, Approve.	SFM does not adopt <i>Appendix P</i> . NIST comment addressed Chapter 49 but appears to address subject matter in the proposal for Appendix P.	