INITIAL STATEMENT OF REASONS FOR PROPOSED BUILDING STANDARDS OF THE OFFICE OF THE STATE FIRE MARSHAL REGARDING THE 2025 CALIFORNIA WILDLAND-URBAN INTERFACE CODE, CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 7 (SFM 04/25)

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE and BENEFITS

Government Code Section 11346.2(b)(1) requires a statement of specific purpose of each adoption, amendment, or repeal and the problem the agency intends to address and the rationale for the determination by the agency that each adoption, amendment, or repeal is reasonably necessary to carry out the purpose and address the problem for which it is proposed. The statement shall enumerate the benefits anticipated from the regulatory action, including the benefits or goals provided in the authorizing statute.

The specific purpose of the proposed wildland regulations is to update, clarify, and enhance requirements related to Administration, Definitions, Fire Hazard Severity Zones, Building Construction, Fire Protection, Reference Standards, and the Model Ordinance Template. These amendments are intended to improve consistency, usability, and implementation of wildland fire safety requirements within identified Wildland-Urban Interface (WUI) areas, while supporting effective enforcement by state and local agencies.

Problem

Wildland-Urban Interface fire risk continues to increase due to factors such as climate conditions, development, and vegetation characteristics in fire-prone areas.

Rationale

The proposed amendments refine administrative provisions, update definitions, and incorporate the Fire Hazard Severity Zone Viewer as a standardized tool for identifying applicable fire hazard areas. Revisions to building construction and fire protection requirements are intended to align with current industry standards and best practices.

Benefits

The proposed regulations are expected to improve public safety by strengthening fire-resistant construction practices and fire protection requirements in wildland-urban interface areas. Additional benefits include improved regulatory clarity, increased consistency across jurisdictions, and support for effective wildfire risk reduction while facilitating compliance by designers, builders, and property owners.

CERTIFYING RULEMAKING FOR EMERGENCY REGULATIONS SFM EF 01/25

Some of the regulations proposed below were presented as emergency regulations and heard and approved by the Building Standards Commission on October 15, 2025. The emergence of these regulations was based on changes to the Health and Safety Code and the Southern California Fire on January 7, 2025.

On January 7, 2025, the Palisades and Eaton fires started in the Local Responsibility Area (LRA). These fires killed 31 people and destroyed over 16,000 structures. As homes are

rebuilt after these fires, homeowners and local jurisdictions must understand what laws and regulations apply. These events demonstrated a sustained and acute threat to life and property that supported the proposed and approved emergency regulations.

Following the initial adoption of the emergency building standards, SFM proceeds to complete the certifying rulemaking process through regular rulemaking process during the 2025 Intervening Code Adoption Cycle to make the emergency building standards permanent in accordance with Government Code Section 11346.1 and Health and Safety Code Section 18938.

ITEM 1
Chapter 1 Administration

SUB-ITEM 1-1
Division I California Administration, Section 1.1.2 Purpose

Part of the proposed changes in this section were included in the Emergency Regulations approved on October 15, 2025

The specific purpose of this rulemaking effort by the SFM is to act in accordance with Health and Safety Code section 13108.5 by being clear that Part 7 applies in the Very High Fire Hazard Severity Zone (FHSZ) and High FHSZ in the LRA.

Proposed amendments that were included in the Emergency Regulations:

- Removing the adjective “burning” from “burning embers” and simply using the term “embers”, as well as removing the adjective “vegetation” from “vegetation fire” and simply using the term “fire”, provides clarity and reduces redundancy for code users. The term “embers” inherently implies that they are hot and capable of ignition. The term “fire” is globally understood. This simplification enhances readability without altering the technical meaning, supporting more efficient interpretation and application of the provisions in the code.
- Expanding the application of CWUIC to High FHSZ’s in LRA by adding the term “High” to align directly with HSC 13108.5.

  Adoption of these regulations is necessary to effectuate HSC section 13108.5. Senate Bill (SB) 63 (Ch. 382, Sec 6.5, effective January 1, 2022) amended HSC section 13108.5 requiring the Office of the State Fire Marshal and the Department of Housing and Community Development to propose, and the Building Standards Commission to adopt, expanded application of building standards adopted pursuant to this section to High FHSZ’s in LRA during the next triennially occurring code adoption cycle.

  The 2024 Triennial rulemaking cycle was the next adoption cycle after the statute was amended. However, the timeline for expanding the building standards did not align with the most recent development of the California FHSZ maps, which were transmitted to the local agencies in March 2025.

  The 2007 FHSZ maps only designated the LRA Very High FHSZ’s. Government Code (GOV) section 51178 was also amended in 2021 by SB 63, which authorized the State Fire Marshal to identify the state's FHSZ’s as moderate, high, and very high.

The 2025 California FHSZ maps have changed the regulatory landscape and created an urgent need for building standards in areas not identified in previous maps. The maps capture areas where local government has primary responsibility for fire protection and where wildfire risk exists.

The 2025 California Wildland-Urban Interface Code regulations became effective January 1, 2026, as well as the Emergency Regulations approved on October 15, 2025.

SFM proposes further amendments that were not included in the Emergency Regulations to do additional cleanup that was discussed with stakeholders after the emergency rulemaking was approved. This includes a clean distinction of the Fire Hazard Severity Zones:

The current code references Wildland-Urban Interface (WUI) areas without distinguishing between different hazard levels, which creates confusion because enforcement authority and mitigation requirements in California are tied specifically to FHSZs—including the "High" category—designated by cities under Health and Safety Code Section 13108.5. The problem is that the term "WUI areas" is overly broad, does not match statutory terminology, and can be interpreted inconsistently across jurisdictions. The proposal deletes the generic reference to "Wildland Urban Interface areas," and replaces it with the accurate phrase "fire hazard severity zones designated by cities." This solution ensures the code reflects the correct legal framework for local hazard designations and clarifies where specific requirements apply.

The benefit is improved consistency with state law, clearer guidance for local agencies and developers, and more precise application of wildfire-risk mitigation measures in the areas where they are intended and legally required.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 1-2
Division II Scope and Administration, Section 101.2 Scope

SFM proposes to amend the scoping section that has caused code user confusion.

The first edition of the California Wildland-Urban Interface Code was a major effort that involved moving provisions from different parts of Title 24 and using the International Wildland-Urban Interface Code as a model. After publication, users reported confusion about the code's scope and how the regulations should be applied. To resolve this, the State Fire Marshal (SFM) is proposing to amend Section 101.2 (Scope) to clearly state where the regulations apply and provide a reference to Section 101.3.1 (Application).

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 1-3
Division II, Section 101.3.1 Application and 101.3.1.1 Application date and where required

The proposed amendments in these sections were included in the Emergency Regulations approved October 15, 2025, with additional modifications.

Proposed amendments that were included in the Emergency Regulations:

- Combining two application sections 101.3.1 and 101.3.1.1 into one clear section on where the wildland urban interface building standards will be applied.
- Deleting the application date or "trigger date" exceptions to comply with the 2025 California Wildland-Urban interface regulations is to effectuate HSC section 17922(d). The continuation for the allowance of an exception to the wildland-urban interface provisions in Part 7 compounds the goals and objectives of protecting and mitigating the conditions that might cause a fire originating in a structure to ignite vegetation in the WUI area, and conversely, a wildfire burning in vegetative fuels to transmit fire to buildings and threaten to destroy life, overwhelm fire suppression capabilities or result in large property losses. The removal of the "trigger dates" and exceptions closes the gap on the existing building and structure stock and aligns with the mission and objectives of CALFIRE/ Office of the State Fire Marshal on campaigning home hardening, retrofits, Firewise communities, access to grants and expands the overall safety of the built environment in the identified FHSZ's.

  HSC 17922. *(d) … Building additions or alterations which increase the area, volume, or size of an existing building, and foundations for apartment houses and dwellings moved, shall comply with the requirements for new buildings or structures specified in this part, or in building standards published in the California Building Standards Code, or in the other rules and regulations adopted pursuant to this part.*

SFM proposes not to include some of the language added in the Emergency Regulations in the certifying rulemaking:

- SFM proposes to not include #4 in the list of areas where the regulations apply to buildings, that stated "Land designated as a Wildland-Urban Interface Area by cities and other local agencies". This gives better clarity for the application of the code regulation to apply to designated areas, as Fire Hazard Severity areas in all of the SRA, and as High and Very High in the LRA. There is always the ability for local jurisdictions to expand the designated areas or designate additional areas.
- SFM also proposes to not include Exceptions 1, 2 and 4 that were included in the Emergency Rulemaking based on the proposal from the 2025 CWUI Work Group – Accessory Structures Subgroup. The exceptions for Group U occupancy and accessory structures belong in Chapter 5, as they are addressed specifically in Section 504.11. Elimination of the exceptions removes duplicative and confusing regulatory requirements.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 1-4
Division II, Section 101.5 Additions or alterations

SFM proposes adopting section 101.5, which was not adopted before.

Deleting the “trigger dates” from Section 101.3.1 Application left a gap in the code for what to do when there is an addition or alteration to an existing building in the wildland-urban interface area, so adoption of the model code language closes that gap. This section acknowledges that existing buildings may not comply with this code. Any new construction or modification to the building must comply with the code.

For example, consider a structure that exists in the wildland-urban interface area but does not meet the ignition-resistance requirements of this code. The owner adds a new portion to the building. The new portion must comply with the ignition-resistant requirements, while the existing portion may be left untouched. All components of the existing building that are removed or modified must also comply with the current requirements, but the unmodified portion of the building remains as is. This situation is acceptable as long as the addition or alteration does not increase the building's hazards.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 1-5
Division II, Section 101.6 Maintenance

SFM proposes amending section 101.6 Maintenance to close the gaps identified in the SFM CWUI work group.

The proposal cleans up and closes gaps in the code for the maintenance and repair of buildings within the wildland. The reference to NFPA 1140 provides the code official with an option to use a national standard for wildland mitigation. The standard includes many aspects of wildland management that are addressed in the Fire Safe Regulations of Title 14, as well as the California Wildland Urban Interface Code. The standard closes some of the gaps that could enhance the overall use of both the regulations and the standard when used together.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 1-6
Division II, Section 104.2.2 Alternative materials, design and methods

SFM proposes amending section 104.2.2 to include an International Wildland-Urban Interface Code (IWUIC) errata that was omitted from the first printing of the 2024 edition.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 2
Chapter 2 Definitions

SUB-ITEM 2-1
Glazed Door

SFM proposal from the 2025 CWUI Work Group – Windows Subgroup to add the new definition.

The term “glazed door” is currently used in sections 504.8 and 504.9. This definition is consistent with the California Energy Code and clarifies what constitutes a glazed door based on the percentage of the door that is glazed. This proposal has little to no cost impact. This is what the industry generally has used to define a glazed door.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 2-2
Home Hardening

The proposed definition was included in the Emergency Regulations approved October 15, 2025.

Adding the definition of “Home-Hardening” is to effectuate HSC Sections 17958, 17958.5, 17958.7, and 18941.5 relative to local amendments to Title 24 and prohibits cities and counties from making changes that apply to residential units, unless certain conditions are met. The budget trailer bill AB 130 (Chapter 22, Statutes of 2025, see Sections 29-31 and 37-42 of the bill) became effective June 30, 2025, and enacted a moratorium on state and local building standards affecting residential units beginning October 1, 2025, and ending June 1, 2031. One of the conditions that local jurisdictions can make in their ordinances is changes or modifications related to home hardening. The term “home hardening” is not defined in statute or regulation, so SFM proposes to define the term.

The proposed definition emphasizes methods rather than prescriptive measures to allow for flexibility across the state, building types, and evolving standards. The definition identifies the three primary mechanisms buildings ignite during a wildfire. The definition recognizes that fire resistance is achieved through both design, material choices, and ongoing upkeep. The phrase “building and structure” broadens the applicability beyond the primary building to include accessory structures that can contribute to fire spread or structural loss.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 2-3
Local Responsibility Area (LRA)

SFM proposes to align the definition of Local Responsibility Area with the Title 19 definition for coordination.

The proposal to coordinate the definition of the Local Responsibility Area is to ensure a consistent understanding of the term. This will reduce misinterpretations and errors. It also streamlines compliance and enforcement by eliminating conflicting or overlapping language. Overall, this alignment improves clarity in applying the regulations.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 2-4
State Responsibility Areas (SRA)

SFM proposes to align the definition of State Responsibility Areas with the definition in Public Resources Code 4102 for coordination.

The proposal to coordinate the definition of the State Responsibility Areas is to ensure a consistent understanding of the term. This will reduce misinterpretations and errors. It also streamlines compliance and enforcement by eliminating conflicting or overlapping language. Overall, this alignment improves clarity in applying the regulations.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 2-5
Vegetation

SFM proposes adding a new defined term. This proposal comes from the 2025 CWUI Work Group – Chapter 6 Subgroup.

Several sections within Chapter 6 establish requirements related to “vegetation,” yet the term is not currently defined, creating ambiguity for code users and enforcement agencies when determining what materials or conditions are subject to these provisions. This lack of clarity can lead to inconsistent interpretations, uneven enforcement, and confusion for property owners. The proposal adds a definition of “vegetation” taken directly from Government Code Section 51177 to ensure alignment with existing statutory terminology

and statewide defensible-space requirements. By incorporating this definition into Chapter 2, the code provides a clear and authoritative meaning for the term wherever it is used. The benefit of this proposal is improved consistency, enforceability, and understanding of vegetation related requirements in Chapter 6, supporting clearer compliance expectations and reducing disputes or misapplication of the code.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 2-6
Wildland-Urban Interface Area

The existing definition of a “Wildland-Urban Interface Area” has caused confusion because it does not clearly express the intended meaning of the term or the authority responsible for designating such areas. This lack of clarity has resulted in inconsistent application of the regulations among local jurisdictions and enforcing agencies.

The proposed amendment clarifies the meaning and intent of a Wildland-Urban Interface (WUI) area by:

- Explicitly identifying the State Fire Marshal as the authority responsible for determining Fire Hazard Severity Zones under Public Resources Code (PRC) Sections 4201–4204.
- Maintaining alignment with designations of High or Very High Fire Hazard Severity Zones under Government Code (GOV) Sections 51175–51189.
- Affirming that other areas may be designated by the enforcing agency under GOV Section 51179(b) when they present a significant wildfire risk.

This clarification aligns the definition with existing state laws and the State Fire Marshal’s hazard mapping process, ensuring consistent interpretation and enforcement. As a result, the regulation becomes easier to apply, improves public safety by ensuring appropriate mitigation measures in high-risk areas, and enhances efficiency for code officials and stakeholders involved in plan review and compliance.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 3
Chapter 3 Wildland Urban Interface Areas

SUB-ITEM 3-1
Section 301.1. Scope and Section 302.1.1 Fire Hazard Severity Zone Viewer

This amendment provides code users with the location where to find the Fire Hazard Severity Zone maps.

The Scope of the chapter outlines the process for mapping areas in the state for adoption as Fire Hazard Severity Zones.

This proposal responds to a comment made during the Emergency Commission hearing on October 15, 2025, in which a participant requested clarification on where to locate Fire Hazard Severity Zone (FHSZ) maps. The problem is that code users currently lack a clear reference for finding these maps, which are critical for determining applicable requirements in high-risk areas. The solution is to explicitly provide in the code the location or reference where the FHSZ maps can be accessed. The benefit is that code users, including local agencies, developers, and designers, will have clear, direct guidance for identifying designated zones, ensuring consistent application of wildfire-risk mitigation measures and improved compliance with state and local regulations.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 3-2
Section 302.2 Review of Fire Hazard Severity Zones

SFM proposes to delete the model code language that is unnecessary and redundant. Removing this duplicate text helps prevent confusion, reduces the chance of conflicting interpretations, and streamlines the document for easier use. It also ensures the code remains concise, improves consistency with related documents, and supports more efficient updates in future editions. SFM is proposing an editorial correction to the capitalization of Fire Hazard Severity Zones and State Responsibility Area.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 3-3
Section 302.3 Local Designation

SFM proposes adding a new section to increase awareness and reinforce local jurisdictions' responsibility to identify and include areas within their Local Responsibility Areas that may be considered fire-prone and that the State Fire Marshal has not identified. A local agency shall not decrease the level of a fire hazard severity zone but may increase the level of the fire hazard severity zone at its discretion.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 4
Chapter 5 Special Building Construction Regulations

SUB-ITEM 4-1
Section 503 and Section 503.1 General

Proposed amendment is Section 503.1 that was included in the Emergency Regulations approved October 15, 2025, deletes Exception 2 to bring this section into alignment with amendments proposed and approved in Section 101.3.1 and 101.3.1.1.

SFM proposal, which was not included in the Emergency Regulations, from the 2025 CWUI Work Group – Ignition resistant materials and weathering Subgroup – is to early adopt provisions from the ICC 2024–2026 Code Development Cycle, Group A as SFM amendments:

- Section 503 revised title to be more inclusive of noncombustible materials or materials that have a fire-resistant rating; derived from WUIC18-24 proposal.
- Section 503.1 amendments are derived from WUIC17-24 and WUIC18-24 proposals. Fire-retardant-treated wood roof coverings are a different class of materials than the other ignition-resistant building materials in section 503.2 and have been relocated to 503.3 (WUIC17-24). The new amendment to fire-resistance-rated construction was enacted to align with the relocation to 503.4 (WUIC-18). See related amendments proposed in Sub-Item 4-2.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-2
Sections 503.2, 503.2.1, 503.2.1.1, 503.2.1.1.1, 503.2.1.1.2, 503.2.2, 503.2.3, 503.2.3.1, 503.2.3.2, 503.2.3.3, 503.2.3.3.1, 503.2.3.3.2, 503.2.3.3.3, 503.2.3.3.4, 502.5, 503.3, 503.4, 503.5, 503.5.1, 503.5.2, 503.5.3, 503.5.4

SFM proposal from the 2025 CWUI Work Group – Ignition resistant materials and weathering Subgroup. The following amendments are proposed to bring forward (early adopt) provisions from the ICC 2024–2026 Code Development Cycle, Group A proposals identified by their numbers below, and to propose additional SFM amendments.

These early adoption amendments are editorial and reorganizational only, without further amendment, and have no change in regulatory effect:

- Section 503.2.1 revised section reference, derived from WUIC16-24
- Section 503.2.1.1 relocated and updated section references, derived from WUIC16-24
- Section 503.2.1.1.1 relocated, derived from WUIC16-24
- Section 503.2.3 relocated, derived from WUIC17-24
- Section 503.2.3.1 relocated, derived from WUIC17-24

- Section 503.2.3.2 relocated, derived from WUIC17-24
- Section 503.2.3.3 relocated, derived from WUIC17-24
- Section 503.2.3.3.1 relocated, derived from WUIC17-24
- Section 503.2.3.3.2 relocated, derived from WUIC17-24
- Section 503.2.3.3.3 relocated, derived from WUIC17-24
- Section 503.3 relocated, derived from WUIC17-24
- Section 503.4 relocated, derived from WUIC1-24

Specific rationale for amendments that are editorial and/or reorganizational that bring forward provisions from the ICC 2024–2026 Code Development Cycle, Group A:

- Section 503.2.1.1.2 clarifying language, derived from WUIC16-24. This section acknowledges that noncombustible materials for the construction of exterior components of the structure are tested differently from the noncombustible materials for reduced clearances to heat sources within the structure.
- Section 503.4 is derived from WUIC18-24. These amendments relocate the section and delete an unnecessary term referring to 1-hour fire-resistance-rated construction.

Additional SFM editorial or organization amendments:

- Section 503.2 is revised to relocate an existing regulation from 503.2.5 without amendment, having no change in regulatory effect.
- Section 503.2.2 is revised to specify the weathering test applicable to fire-retardant-treated wood and correlate with the current requirement in Section 503.2.3.3.1 (previously 503.2.4.3.1).
- Sections 503.3 through 503.3.4 renumbered accordingly to 503.5 through 503.5.4.

SFM proposes to add new requirements in Section 503.2.3.3.4:

- Section 503.2.3.3.4 is added to address the durability of ignition-resistant materials exposed to atmospheric conditions. The ignition-resistant materials in these sections are used for the structure's exterior shell. These materials are exposed to weather and temperature changes and must continue to perform as expected for the life of the structure. The weathering exposure is the same ASTM standard and the same exposure currently required for fire-retardant-treated wood.

  This proposal may result in a minimal increase in consumer costs. Materials not currently undergoing a weathering exposure will be required to comply, and this additional process will be required. The weathering exposure could involve multiple materials weathering simultaneously, with the anticipated cost for the test between $12,000 and $25,000. This test would be performed for the material, and the cost would then be distributed over all the same products produced.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-3
Section 504.2 Roof Assembly

SFM proposal from the 2025 CWUI Work Group – Roofs Subgroup.

Section 504.2 is revised to provide consistency with the proper use of the term classified when used to describe a roof assembly that has been tested in accordance with ASTM E108 or UL 790. The Section 504.2 Exceptions description is revised to align with the California Building Code Section 1505.2 more closely, and exception #4 is revised to include the ASTM standard specification for asphalt-saturated underlayment that is compositionally equivalent to ASTM D226, Type II products that are currently permitted.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-4
Section 504.2.1 Roof covering voids and subsections

SFM proposal from the 2025 CWUI Work Group – Roofs Subgroup.

Section 504.2.1. 504.2.1.1 and 504.2.1.2. Roof covering voids are replaced or revised to clarify the requirements for roof coverings with an airspace under the roof covering. These requirements protect the deck and openings to this airspace in the event of exposure to fire or embers. The proposed language and subsections address each of these possibilities. Additionally, it provides an alternative material to ASTM D3909 (mineral surfaced cap sheet) that meets the same fire-resistant requirements of a mineral surfaced cap sheet.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-5
Section 504.2.2 Roof valley flashings

SFM proposal from the 2025 CWUI Work Group – Roofs Subgroup.

Section 504.2.2 Roof valley flashings are revised to be consistent with the proposed IWUIC revisions being considered during the in-progress ICC Group A code cycle. This section also provides additional language that allows for alternative materials to ASTM D3909, which can provide a Class A roofing assembly when tested in accordance with ASTM E108 or UL 790. In item 504.2.2.2, the subcommittee removed the unit measure for the thickness of the metal flashing to use in the test and specified the metal roof covering

by galvanized steel gauge. This was done to consider inconsistencies between gauge and thickness, depending on the type of steel.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-6
Section 504.2.4 Skylights

This proposed revision adds a pointer under the roof assembly section 504.2 for skylights, tubular daylighting devices, and sloped glazing to prevent any confusion that these products fall under roof assembly compliance. This is a proposal for the 2027 edition of the International Wildland Urban Interface Code. The proposal number is IWUIC27. The final outcome of the proposal will be determined at the International Code Council's Public Comment Hearing in April 2026. This proposal has little to no cost impact, as it does not change the current CA WUI Code requirements.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-7
Section 504.3.1 Protection of open eaves

This proposal was included in the Emergency Regulations approved October 15, 2025.

During the large-scale adoption of Part 7, a clerical error occurred regarding section 504.3.1 Protection of open eaves. The State Fire Marshal proposes to correct this clerical error as permitting this error to become regulation creates an opportunity to allow unprotected rafter tails in open eave designs, which conflicts with the intent of hardening buildings and structures against wildfire exposure.

There are no additional changes proposed except for spelling correction in the word "Fascias".

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-8
Section 504.5 Exterior walls

The revisions in this proposal are intended to clarify the application of these sections. The language in the current Section 504.5 creates confusion regarding its correlation with Section 504.5.2, and these sections have been misapplied as standalone sections,

allowing combustible exterior wall coverings to be installed over a 1-hour-rated wall. These sections are designed to work together, and compliance is achieved when the exterior wall meets both the exterior wall construction and exterior wall covering provisions. Misapplication of the exterior wall covering requirements has been interpreted to allow a combustible exterior wall covering applied over the surface of a 1-hour-rated wall. This is not the intent, as the exterior wall covering would carry the fire upwards to the eaves and roof.

Section 504.5 is amended to clearly state that the exterior wall construction must comply with the construction requirements, **or** the exterior wall covering must comply. The designer can choose one or both.

Section 504.5.1 is a new section that consolidates provisions from 504.5 to clarify the requirements for the code user. With this revision, the exterior wall must comply with one of the six designs in Section 504.5.1 **or** an exterior wall covering in accordance with Section 504.5.2.

Revisions to new Section 504.5.1:

- The clarification is added that wall coverings applied for any exterior wall design method selected from 504.5.1 shall also comply with section 504.5.2.
- Item 1 is revised to clarify that the exterior wall covering over a 1-hour wall must comply with Section 504.5.2.
- Item 2 is revised to specify “ignition-resistant materials,” which include noncombustible materials and fire-retardant-treated wood. Revision of Item 2 allows the deletion of the previous section 504.5 Item 9 because fire-retardant-treated wood is included under ignition-resistant materials.
- Item 3 is revised to remove the term “heavy timber” and include the term “cross-laminated timber”. Heavy timber construction in the CBC does not provide specific wall construction criteria. Removing the reference to “heavy timber” eliminates possible confusion, but the 4-inch thickness requirement remains. Cross-laminated timber has been added as an acceptable method of providing wood construction, provided the minimum nominal dimension is at least 4 inches.
- Previous section 504.5 items 7 and 8 are deleted, because they are no longer needed with the clarification that you can meet 504.5.1 or 504.5.2.

Section 504.5.2 states, “exterior wall coverings shall comply with one or more of the following requirements,” which means it is intended to apply to ALL exterior wall coverings. This section applies to all exterior walls where any exterior wall covering is provided. The exterior wall covering must comply with one of the four methods.

The 2025 California Building Code addresses combustible materials in fire-resistance-rated assemblies in Section 703.2.1.4. This section clearly states that where materials are later incorporated into a fire-resistance-rated assembly, sufficient data shall be provided to demonstrate that the fire-resistance rating will not be reduced, thereby recognizing that the wall covering affects the flame spread across the surface. Applying a combustible exterior wall covering on the surface of a 1-hour rated assembly does not comply with the code—the exterior wall covering must still comply with Section 504.5.2.

The exception in Section 504.5.2 is deleted since the ignition of the exterior wall covering is a significant hazard even when it is attached to a 1-hour wall. This is consistent with the

previous concept that the exterior wall covering requirements are always intended to apply.

The requirement for flashing is relocated from Section 504.5.1 to Section 504.5.3. This clarifies the requirement for flashing or noncombustible materials to apply all exterior walls, whether the wall was constructed in accordance with Section 504.5.1 or an exterior wall covering was installed in accordance with Section 504.5.2. In all cases, the bottom 6 inches must be noncombustible or provided with a metal flashing.

The revised sections clarify the design options, which are to:

1. Construct the exterior wall complying with Section 504.5.1 and any wall covering applied shall be in accordance with 504.5.2.
2. Construct the exterior wall of any material complying with the CBC or CRC and provide an exterior wall covering complying with Section 504.5.2.
3. Construct the exterior wall complying with Section 504.5.1 and cover it with an exterior wall covering, in which case the exterior wall covering must comply with Section 504.5.1 and 504.5.2.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-9
Section 504.7.3.1 Deck Flashing

SFM proposal from the 2025 CWUI Work Group – Roofs Subgroup.

The flashing requirements are outlined in Section 504.5.3, and this change will reference that section for exterior walls in the sections related to roofs and decks. This proposal intends to clarify redundant language related to exterior walls presented in the section for decks by providing a pointer for flashing at exterior wall intersections. The change is a clarification and clean-up, and does not impose any cost impact on construction.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-10
Section 504.8 Exterior glazing and subsections

SFM proposal from the 2025 CWUI Work Group – Windows Subgroup. This proposal contains both technical and editorial revisions.

The technical revision is to option 1 of section 504.8, which is revised to specify at least the inner pane of multilayered glazed panels be tempered. Recent research (https://www.doi.org/10.1007/s10694-024-01656-z) found that the type of glass (tempered or annealed) of dual-pane window [multilayered glazed panels] is an indicator in the performance of the window assembly to resist exterior fire. Window pane assemblies with

both panes of tempered glass performed the best of the four types [(1) both panes annealed glass, (2) both panes tempered glass, (3) annealed glass fire side pane and tempered glass back side pane, and (4) tempered glass fire side pane and annealed glass back side pane] considered in this study. Windowpane assemblies with annealed glass on the fire (exterior) side and tempered glass on the back (interior) side outperformed windows with the opposite configuration.

Option 5 in section 504.8 is a compliance option for skylights. The research study investigated exterior glazing in a vertical orientation, which is not typical for skylights, and, due to safety requirements for skylights, tempered glass is typically the outer pane.

There are four editorial revisions to improve clarity:

1) Clarified the list of exterior glazing configurations (charging language 504.8).
2) Clarified section 504.8 option 2
3) Clarified section 504.8 option 3
4) Clarified the requirements for protecting the opening portions of operable skylights (section 504.8.2).

This proposal has little to no cost impact, as it does not change the current CA WUI Code requirements.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-11
Section 504.10 Vents

SFM proposal from the 2025 CWUI Work Group – Vent Subgroup.

Section 504.10 is revised to clarify which openings in the building exterior envelope are included in these requirements. The requirement to protect ventilation openings applies to attic vents, enclosed rafter vents, eave vents, and underfloor vents, which are referenced to specific code sections in the CBC or CRC. Other ventilation openings designed to provide natural ventilation into not normally occupied spaces are also included, which include ventilation openings into a garage or equipment room, for example. The exception indicates openings into a structure which do not need protection. These openings are pipe penetrations, ducted or connected to appliances and equipment.

Vents will fall into one of two categories:

1. Tested and listed vents under ASTM E2886 or CSFM (Section 504.10.1)
2. Vents on the roof ridge or vents on the slope of the roof in the roof field that cannot be tested to ASTM E2886 (Section 504.10.2)

In other words, the only vents that are not required to be tested and listed to ASTM E2886 or approved by the CSFM will be roof ridge vents and off-ridge field vents.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-12
Section 504.10.1 Vent testing

SFM proposal from the 2025 CWUI Work Group – Vent Subgroup.

Currently, vents only need to be tested in one orientation for the flame intrusion test of ASTM E2886. The standard has the capability to test horizontal and/or vertical vents, and currently, we approve and list vents exactly as they were tested. So if the laboratory conducted the flame intrusion test horizontally, then the SFM Building Materials and Listing program (BML) will list the vent for horizontal use only.

BML has reviewed the proposal, and the BML team is in agreement. However, for clarity's sake, BML has proposed a new requirement. Also, removing the phrase "Wildfire Flame and Ember Resistant". This is due to some confusion where people think that the SFM BML requirements for listing vents differ from what is required by code. The confusion around the definition of the term "*Wildfire Flame and Ember Resistant vents*" is because it is not defined.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-13
Sections 504.10.2 Roof ridge and off-ridge field vents and 504.10.3 Vent locations

SFM proposal from the 2025 CWUI Work Group – Vent Subgroup.

Section 504.10.2 is revised to address vents that are excluded from the ASTM E2886 standard. Vents can be excluded from the scope of the standard because:

1. The vent does not fit into the test apparatus.
2. The vent is intended for installation on a roof slope.
3. The vent is intended for installation on a roof ridge.
4. The vent is intended for installation on the underside of a sloped eave.

The intent of Section 504.10.2 is to provide an approval path for these vents that cannot be tested in accordance with ASTM E2886. While this may not provide equivalence to testing under ASTM E2886, it is the best available option at this time. ASTM is currently working on the development of a test standard for these other vents, but completion of that standard is years away. Since vents under this section have not actually been tested, a separation from the property line of 10 feet is included. The 10-foot limitation is included in the current code in Section 504.10.3, but applies only to dormer vents and gable end vents. The separation from the property line is not deemed necessary for a tested and listed vent. Therefore, the requirement for this separation distance may or may not be appropriate for all gable end vents and dormer vents. Item 4 of Section 504.10.2 requires this limitation to apply to vents that are not tested and listed.

Item 5 is added to Section 504.10.2 to limit the size of off-ridge field vents. The size of the

vent opening covered by vents installed in the field of the roof is limited to 144 square inches as a firefighter safety issue. Firefighters working on a rooftop could inadvertently step onto a vent, and this limitation is designed to prevent the firefighter from falling through the roof surface. A foot may drop through, but the firefighter is not expected to pass through the limited-size opening. The size limitation does not apply to roof ridge vents because the roof structural members along the ridge prevent falling through the ventilation opening.

This proposal will not increase costs. This proposal clarifies the application of the requirements currently outlined in the CWUIC, with the exception of the size limitation for off-ridge field vents in Section 504.10.2, Item 5. However, during the Vents Subcommittee meetings, the industry representatives on the call did not express concern with this requirement since it only applies to off-ridge field vents.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-14
Sections 504.11 Accessory Structures and subsections

SFM proposal from the 2025 CWUI Work Group – Accessory Structures Subgroup.

This proposal makes the following modifications to the requirements for accessory structures:

1. Eliminates redundancy in existing provisions to improve clarity.
2. Revises construction requirements for accessory structures based on location and associated risk to buildings containing habitable space.
3. Establishes requirements for accessory structures located in close proximity to lot lines.

Current provisions limit construction of accessory structures to noncombustible or ignition-resistant materials with a Class A roof assembly. While appropriate for structures less than 120 sq. ft., these requirements are impractical for larger structures where exterior walls, framing, openings, and other components are commonly constructed of alternative materials.

This proposal introduces a broader set of construction options to provide flexibility and affordability while maintaining appropriate levels of fire protection. It also incorporates findings from NIST and IBHS research on building separation. Full-scale testing conducted at IBHS demonstrated that when building spacing is reduced to 30 ft or less (findings presented at CWUIC Workgroup meeting), fire intensity and heat exposure increase significantly. Accordingly, the minimum safe separation for accessory structures has been revised from 50 ft to 30 ft. For larger agricultural buildings, however, the 50 ft separation remains appropriate due to building size and fuel load.

This proposal is not expected to result in a general increase in construction costs. In most cases, the expanded range of acceptable methods and materials will provide more options

and, in some situations, allow for more practical construction approaches. While certain components—such as vents—may experience modest cost increases, these impacts are limited in scope and are offset by the overall flexibility and practicality gained through the proposed changes.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-15
Section 504.11.6 Roof construction

SFM proposal from the 2025 CWUI Work Group – Roofs Subgroup.

Section 504.11.6 is revised to provide consistency with the proper use of the term classified when used to describe a roof assembly that has been tested in accordance with ASTM E108 or UL 790.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 4-16
Section 507.1 General

SFM proposal from the 2025 CWUI Work Group – Roofs Subgroup.

Section 507.1 is revised to provide consistency with the proper use of the term classified when used to describe a roof assembly that has been tested in accordance with ASTM E108 or UL 790.

The proposal is also to fix a publication error as “50” is mistakenly printed in an upright font. Model language is “25” which was amended by SFM to be “50” during the 2024 adoption cycle.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 5
Chapter 6 Fire Protection Requirements

SUB-ITEM 5-1
User Note

SFM proposal from the 2025 CWUI Work Group – Chapter 6 Subgroup.

Development and adoption of Local Responsibility Area (LRA) Very High Fire Hazard Severity Zones (VHFHSZs) is already fully addressed in Chapter 3, which establishes the authority, methodology, and procedures for identifying, mapping, and adopting these zones at the local level. The problem with repeating or restating these requirements elsewhere in the code is that it creates redundancy, risks conflicting language, and may cause confusion for local jurisdictions regarding which section governs the process. The proposed solution is to rely exclusively on the existing Chapter 3 provisions, which already contain the complete regulatory framework for LRA VHFHSZ development, public review, and adoption. The benefit of this proposal is that it eliminates unnecessary duplication and ensures consistent application of fire hazard–mapping requirements.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 5-2
Section 602.3.2 Final Fire Protection Plan

SFM proposal from the 2025 CWUI Work Group – Chapter 6 Subgroup.

The proposal states that when existing vegetation is proposed to remain on a site, it must be evaluated for compliance with defensible space requirements and for any potential impacts on both proposed and existing buildings. Currently, this expectation is implied but not explicitly stated outside of the landscape plan requirements in Section 603.3.1, leading to inconsistent interpretation about whether existing vegetation must undergo the same level of review as newly installed landscaping. The problem is that without explicit language, some jurisdictions may overlook the necessary assessment of existing vegetation during development review, potentially leaving hazardous conditions in place that undermine WUI fire risk mitigation. The solution is to clearly state in the code that all existing vegetation to remain on a site is subject to the same defensible-space evaluation as new landscaping. The benefit is improved consistency in plan review and enforcement, reduced ambiguity for designers and property owners, and enhanced fire safety by ensuring that all vegetation, new or existing, is assessed for compliance.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 5-3
Section 603.3.1 Contents

SFM proposal from the 2025 CWUI Work Group – Chapter 6 Subgroup.

Public Resources Code Section 4291 and Government Code Section 51182 establish the new 0–5-foot ember-resistant zone, recognizing the area immediately adjacent to

structures as the most vulnerable to ignition during wildfires. However, because no formal statewide regulatory requirements have yet been issued for this zone, there is uncertainty among designers, property owners, and enforcement agencies regarding how to evaluate and treat this critical area during development and review. The problem is that the lack of clear direction can lead to inconsistent application of ember-resistant practices, leaving buildings vulnerable to direct ember exposure. The proposal provides a reference to the 0–5-foot ember-resistant zone within the code. The solution creates an awareness that this zone should be addressed during project approval.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

SUB-ITEM 5-4
Sections 604.1 General and 604.3 Requirements

SFM proposal from the 2025 CWUI Work Group – Chapter 6 Subgroup.

The term “hazardous” is not defined in the code and is inherently subjective, which creates inconsistency when applying defensible space requirements. The Public Resources Code and Government Code already apply defensible space requirements to all vegetation and fuels within the fire hazard severity zones, and “vegetation” is clearly defined in Government Code Section 51177 (see related proposal in Item 2-5). The proposal removes the undefined term “hazardous” to eliminate ambiguity and ensure alignment with statutory language and deletes the second sentence in section 604.1 because its content is already addressed in Section 604.3. This solution provides more objective requirements for code users and enforcement agencies, resulting in more consistent application of defensible space standards and improved wildfire risk reduction.

SFM is proposing to add text that clearly states that the requirements of the regulations and laws listed are at the state minimum, and the Local agency has the authority to adopt stricter requirements.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 6
Chapter 7 Reference Standards

SUB-ITEM 6-1
NFPA 1140

SFM proposes to add this standard to Chapter 7 as reference to this standard is proposed to be added in Section 101.6 (SUB-ITEM 1-5). The 2022 edition of NFPA 1140 marks the integration of NFPA 1051, 1141, 1143, and 1144 into a single standard

for wildland fire safety. The reference to this document increases code user awareness for options when developing in the wildland-urban interface. The standard introduces methods for evaluating site and topographic factors, and access constraints. These elements support community resilience and align with California's wildfire mitigation goals. It is useful for designers, developers, fire agencies, and local officials to implement mitigation options early in the development process.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 7
Appendix D Model Ordinance for Fire Hazard Severity Zone Adoption

SFM proposes adopting the Appendix D Model Ordinance for Fire Hazard Severity Zone Adoption. This requirement is driven by HSC Section 51179. SFM erroneously proposed to print this California specific appendix in the code but not adopt it. This proposal is to rectify that error and adopt the appendix as required by the statute.

HSC 51179.

(a) A local agency shall designate, by ordinance, moderate, high, and very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the State Fire Marshal pursuant to Section 51178.

(b) (1) A local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as very high fire hazard severity zones by the State Fire Marshal, as very high fire hazard severity zones following a finding supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the area.

(2) A local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as moderate and high fire hazard severity zones by the State Fire Marshal, as moderate and high fire hazard severity zones, respectively.

(3) A local agency shall not decrease the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency, and, in exercising its discretion pursuant to paragraph (2), may only increase the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency.

(c) The local agency shall transmit a copy of an ordinance adopted pursuant to subdivision (a) to the State Board of Forestry and Fire Protection within 30 days of adoption.

(d) Changes made by a local agency to the recommendations made by the State Fire Marshal shall be final and shall not be rebuttable by the State Fire Marshal.

(e) The State Fire Marshal shall prepare and adopt a model ordinance that provides for the establishment of very high fire hazard severity zones.

(f) Any ordinance adopted by a local agency pursuant to this section that substantially conforms to the model ordinance of the State Fire Marshal shall be presumed to be in compliance with the requirements of this section.

(g) A local agency shall post a notice at the office of the county recorder, county assessor, and county planning agency identifying the location of the map provided by the State Fire Marshal pursuant to Section 51178. If the agency amends the map, pursuant to subdivision (b) or (c) of this section, the notice shall instead identify the location of the amended map.

(Amended by Stats. 2022, Ch. 574, Sec. 10. (AB 211) Effective September 27, 2022.)

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS

Government Code Section 11346.2(b)(1) requires a statement of the reasons why an agency believes any mandates for specific technologies or equipment or prescriptive standards are required.

The SFM believes that the proposed amendments to the current code are offered in both a prescriptive and performance-based manner.

The wildland-urban interface code establishes minimum regulations for fire prevention using prescriptive and performance-related provisions. It is founded on broad-based principles that make possible the use of new materials and new system designs.

This code is founded on principles intended to establish provisions consistent with the scope of a building and fire code that adequately protects public health, safety, and welfare; provisions that do not unnecessarily increase construction costs; provisions that do not restrict the use of new materials, products or methods of construction; and provisions that do not give preferential treatment to types or classes of materials, products or methods of construction.

ASSESSMENT OF EFFECT OF REGULATIONS UPON JOBS AND BUSINESS EXPANSION, ELIMINATION OR CREATION

Government Code Sections 11346.2(b)(2) and 11346.3(b)(1)

SFM has assessed whether and to what extent this proposal will affect the following:

A. The creation or elimination of jobs within the State of California.
These regulations will not affect the creation or cause the elimination of jobs within the State of California.

B. The creation of new businesses or the elimination of existing businesses within the State of California.
These regulations will not affect the creation of new businesses or the elimination of existing businesses within the State of California

C. The expansion of businesses currently doing business within the State of California.
There is not sufficient data to quantify if there will be an expansion of business, however, the regulations that provide a higher level of fire-resistant construction and site planning vegetation are well received by the insurance industry.

D. The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.
These regulations will update and improve minimum building standards, which will provide increased protection of public health and safety, worker safety and the environment.

TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS

Government Code Section 11346.2(b)(3) requires an identification of each technical, theoretical, and empirical study, report, or similar document, if any, upon which the agency relies in proposing the regulation(s).

2018 Research Paper by Headwaters Economics entitled: "Building a Wildfire-Resistant Home: Codes and Costs" and 2025 Research Paper by Headwaters Economics entitled: "Construction Costs for Wildfire-Resistant Homes."

California Building Industry Association (CBIA) notes

Additional articles that provide data related to the insurance crisis:
https://getsafeandsound.com/blog/average-fire-insurance-cost-california/

California's Home Insurance Crisis: Rising Risks, Soaring Costs and Limited Options | Kiplinger

California home insurance crisis: How wildfires are driving rate increases

Thousands of Los Angeles homeowners were dropped by their insurers before the Palisades Fire - CBS News

Wildfire mitigation discounts: How to qualify and save | Insurance.com

https://www.sfchronicle.com/california/article/home-insurance-farmers-21201615.php?utm_source

CONSIDERATION OF REASONABLE ALTERNATIVES

Government Code Section 11346.2(b)(4)(A) requires a description of reasonable alternatives to the regulation and the agency's reasons for rejecting those alternatives. In the case of a regulation that would mandate the use of specific technologies or equipment or prescribe specific action or procedures, the imposition of performance standards shall be considered as an alternative. It is not the intent of this paragraph to require the agency to artificially construct alternatives or describe unreasonable alternatives.

SFM has determined that no reasonable alternative would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed action. In addition, no reasonable alternative considered by the SFM or that has otherwise been identified and brought to the attention of the SFM would be more cost-effective to affected private

persons and equally effective in implementing the statutory policy or other provisions of law.

REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS

Government Code Section 11346.2(b)(4)(B) requires a description of any reasonable alternatives that have been identified or that have otherwise been identified and brought to the attention of the agency that would lessen any adverse impact on small business.

No reasonable alternatives have been identified or have otherwise been identified and brought to the attention of SFM that would lessen any adverse impact on small businesses. Small businesses will not experience an adverse impact due to the proposed SFM amendments.

FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE ECONOMIC IMPACT ON BUSINESS

Government Code Section 11346.2(b)(5)(A) requires the facts, evidence, documents, testimony, or other evidence on which the agency relies to support an initial determination that the action will not have a significant adverse economic impact on business.

The SFM affirms that this rulemaking action complies specifically with the mandates of HSC Sections 13143, 18928, 18949.2(b), 18949(c), and the mandates of the statutory authority of the SFM.

SFM reviewed and vetted the proposed amendments through an established California Wildland-Urban Interface workgroup composed of subject matter experts and relevant stakeholders. These workgroups evaluated the proposed regulatory amendments, discussed their scope and application, and provided technical input and recommendations. The agency replied to the workgroup discussions, meeting materials, written comments, and consensus feedback as part of the record of facts, evidence, documents, testimony, and other evidence supporting its determination.

The CAL FIRE—Office of the State Fire Marshal's CWUI work group was established to support Cal FIRE's mission and strategic plan, which serve and safeguard the people and protect California's resources. The purpose of the work group is to evaluate and recommend improvements to building codes, standards, materials, and communication strategies that reduce wildfire risk in WUI communities while ensuring regulatory changes remain practical, cost-effective, and science based. These proposals comply with AB130 restrictions on changes adopted during the intervening period, as they align with Health and Safety Code Section 18942(2)(C).

WORK GROUP GOALS:

1. To improve the safety and survivability of structures and communities in the WUI area.
2. To promote statewide consistency and clarity in WUI regulations and communications.
3. To ensure that regulatory changes are cost-effective, attainable, and based on sound science.

4. To foster innovation by allowing new, proven materials and technologies to be readily available in California.
5. Create a shared understanding and common messaging around WUI risk, mitigation strategies, and regulatory requirements.

WORK GROUP OBJECTIVES:

1. Enhancements of Code and Standards

a. Evaluate current CWUI code and standards for effectiveness and clarity.
b. Propose revisions that enhance fire resistance without creating undue burden.
c. Encourage alignment with emerging best practices and lessons learned from a recent wildfire.
d. Collaborate with stakeholders to align regulations with emerging technology.

2. Cost of Compliance

a. Analyze the economic impact of existing and proposed regulations on homeowners, builders, and local jurisdictions.
b. Identify areas where costs can be reduced without compromising safety.
c. Identify financial impacts on the construction, renovation, and maintenance of structures in the WUI.

3. Cost-Effective Enhancements without Overregulation

a. Develop recommendations that balance risk reduction with feasibility.
b. Avoid duplicative or unnecessarily complex requirements that discourage compliance.
c. Promote streamlined permitting and review processes when appropriate.

4. Innovation and Material Availability

a. Create a clear pathway for the evaluation and approval of new construction materials and systems
b. Ensure that approved products are cost-effective and broadly available within California.
c. Support pilot projects and partnerships that test new technologies in real-world wildfire conditions.

5. Consistent Messaging

a. Ensure that clear, evidence-based justification supports all recommendations and code change proposals.

WORK GROUP MEMBERSHIP

Members of the work group shall be open to all interested parties including but not limited to state and local fire agencies, building officials, planners, industry experts,

academic researchers, material manufacturers, insurance representatives, and community stakeholders.

ESTIMATED COST OF COMPLIANCE, ESTIMATED POTENTIAL BENEFITS, AND RELATED ASSUMPTIONS USED FOR BUILDING STANDARDS

Government Code Section 11346.2(b)(5)(B)(i) states if a proposed regulation is a building standard, the initial statement of reasons shall include the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates.

Assessment of Potential Impacts on Housing Cost

The proposed code changes, driven by HSC 13108.5, would implement new development, maintenance, and use standards that qualifying residential and commercial buildings must comply with. These standards will affect, among other things, site design, building construction, property and building maintenance, and development review processes.

The proposed changes are likely to have both positive and negative impacts on housing costs through the regulation of the activities mentioned above. The impacts will vary in magnitude and the populations affected, with some impacts easier to quantify than others.

Factors Likely to Increase the Cost of Housing

The proposed code changes may have minimal cost for new residential development and for altering and modifying existing residential buildings. The most significant contributing factor to increased housing costs is the latest proposed standards regulating building construction in Wildland-Urban Interface areas designated as Local Responsibility Areas (LRA) in the “High” Fire Hazard Severity Zone (FHSZ).

Key construction activities regulated by the code include requirements that qualifying development use more costly construction materials and methods, such as ignition-resistant materials and methods for walls, windows, doors, roofs, gutters, vents, decks, and underfloor enclosures. Proposed standards regulate both site and building design, as well as the ongoing maintenance of landscaping. It is estimated that these requirements will have the most significant impact on single-family homes, potentially increasing new construction housing costs by three to twenty-one percent for impacted homes, depending on the degree to which builders must modify their construction materials and methods to comply with the code. While the estimated increase in housing costs could be significant in rare cases, it is anticipated that the provisions of this code, which require modification to specific building systems, will have limited applicability throughout the State. Cost increases would be closer in magnitude to the lower end of the spectrum (~3-6%) for impacted homes.

Additionally, it is estimated that the proposed code changes may entail minimal construction costs for altering and modifying impacted single-family residential homes, on the same order of magnitude.

New standards will not require the addition of or augmentation to existing development review and inspection processes. Building plans for remodels and additions are part of local building and fire existing practices for review and inspections.

Table 5-1 (below) is from the 2018 Research Paper by Headwaters Economics entitled: “Building a Wildfire-Resistant Home: Codes and Costs”.

This study looked at three existing standards:

- California Building Code Chapter 7A – Materials and Construction Methods for Exterior Wildfire Exposure
- International Code Council's International Wildland Urban Interface Code (IWUIC)
- National Fire Protection Association's Standard for Reducing Structure Ignition Hazards from Wildland Fire (Standard 1144)

Table 5-1: Cost and Proportional Difference of Components in New Construction for Typical and Wildfire-Resistant Scenarios

ROOF	TYPICAL	WILDFIRE-RESISTANT	DIFFERENCE
Roofing	$ 14,870	$ 16,380	$ 1,510
Vents	$ 930	$ 1,560	$ 630
Soffit & Fascia	$ 5080	$ 6,970	$ 1,890
Gutters	$ 930	$ 2,760	$ 1,830
Subtotal	**$ 21,810**	**$ 27,670**	**$ 5,860**

EXTERIOR SIDING	TYPICAL	WILDFIRE-RESISTANT	DIFFERENCE
Siding	$ 29,930	$ 12,360	($ -17,570)
Sheathing	$ 3,810	$ 4,180	$ 370
Doors	$ 6,170	$ 8,120	$ 1,950
Windows	$ 8,470	$ 11,530	$ 3,060
Subtotal	**$ 48,380**	**$ 36,190**	**($ 12,190)**

DECK	TYPICAL	WILDFIRE-RESISTANT	DIFFERENCE
Decking Surface	$ 8,230	$ 9,430	$ 1,200
Framing	$ 930	$ 1,230	$ 370
Fascia	$ 570	$ 920	$ 350
Subtotal	**$ 9,730**	**$ 11,580**	**$ 1,850**

ALL COMPONENTS	TYPICAL	WILDFIRE-RESISTANT	DIFFERENCE
TOTAL	**$ 79,920**	**$ 75,440**	**($ -4,480)**

The Executive Summary Table is from the 2025 Research Paper by Headwaters Economics entitled: "Construction Costs for Wildfire-Resistant Homes.".

https://headwaterseconomics.org/natural-hazards/wildfire/construction-costs-for-wildfire-resistant-homes/

This 2025 study looked at the following standards:

1. California's Building Code Chapter 7A (CWUIC Part 7)
2. Insurance Institute for Business & Home Safety (IBHS) Wildfire Prepared Home (WFPH)
3. IBHS's enhanced WFPH Plus

Executive Summary Table: Cost and Proportional Difference of Components in New Construction for Typical and Wildfire-Resistant Scenarios

Assembly	Component	Traditional	CWUIC Part 7	IBHS WFPH Base	IBHS WFPH Plus
Roof	**Subtotal:**	**$25,321**	**$26,311**	**$26,311**	**$26,311**
Eaves	**Subtotal:**	**$1,900**	**$4,284**	**$3,681**	**$5,253**
Exterior Walls	**Subtotal:**	**$11,461**	**$13,569**	**$13,578**	**$13,591**
Windows/Doors	**Subtotal:**	**$8,431**	**$11,391**	**$8,431**	**$12,241**
Deck	**Subtotal:**	**$1,968**	**$1,968**	**$1,968**	**$1,968**
Zone 0	**Subtotal:**	**$1,106**	**$3,742**	**$3,742**	**$3,742**
Total (+18% Inflation):		**$59,223**	**$72,293**	**$68,099**	**$74,465**
Comparison to Traditional		$-	$13,070	$8,876	$15,242
Comparison to CWUIC Part 7		$-	$-	($4,194)	$2,172

California Building Industry Association (CBIA) commentary provided:

- Certain general assumptions regarding construction design must be made when comparing construction costs, such as those listed in the Headwaters analysis. Construction costs vary significantly in the field, depending on the location, design, and materials used, as well as whether it's a single custom home or a production-style housing development involving hundreds of homes.
- For example, in many production-style housing developments, builders commonly use stucco (fiber-cement) siding as the covering material for the exterior walls. As highlighted in Headwaters analysis, stucco provides a much **higher level of fire-resistance** and costs less than cedar planks or masonry products.
- Regarding the roof, these wildfire-resistant roof materials have longer lifespans and reduced maintenance costs than typical, non-fire-resistant materials. Given the high cost of replacing a roof after 20-30 years, this is yet another economic benefit provided by using fire-resistant materials.

Factors Likely to Decrease Housing Costs

The proposed code changes may decrease housing costs for homeowners of new single-family residential development by decreasing insurance premium costs for homes that comply with the California Wildland-Urban Interface Code. There is anecdotal evidence

supporting this, but we were unable to find sufficient data to quantify the magnitude of the potential savings.

The California Wildland-Urban Interface Code (CWUI) provides standards established by industry experts to mitigate the risk of property damage. While both property damage and personal injury have real and significant financial costs, it is challenging to quantify the extent to which adopting the code reduces these risks and their associated costs. The CWUI compliance costs are significantly lower than the increased insurance rates associated with a dwelling not constructed with these fire-resistant features.

The cost of homeowner insurance will continue rising this year, according to a new report by Insurify, with California seeing the second-biggest rate hike in the country after Louisiana (hurricane recovery).

Researchers estimate that homeowner insurance premiums in California will increase by 21 percent throughout 2025, resulting in a projected average annual premium of $2,930, compared to the $2,424 paid by California homeowners in 2024.

However, this higher level of fire-resistant construction is being well-received by insurance companies, which offer lower monthly premiums.

Insurance companies still doing business in California offer reductions in monthly premium payment rates between 10% and 18% for Home-Harding compliance.

For a homeowner who has an annual insurance premium payment of $3,000:

$3,000 x 18% = $540 in annual savings.

List of Insurance Carriers that have left the state, are not accepting new policies, or are cancelling existing policies:

- **Allstate:** paused sale of new policies
- **American National:** stopped writing home insurance policies in California
- **AmGUARD:** Stopped writing home insurance policies in California
- **Chubb:** Significantly scaling back operations in CA
- **Farmers:** Home insurance subsidiary has left the state; there is some information that new policies may be written based on California Department of Insurance
- **Nationwide: Stopped renewing policies in CA**
- **State Farm:** Dropped 72,000 policies in CA

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

Government Code Section 11346.2(b)(6) requires a department, board, or commission within the Environmental Protection Agency, the Resources Agency, or the Office of the State Fire Marshal to describe its efforts, in connection with a proposed rulemaking action, to avoid unnecessary duplication or conflicts with federal regulations contained in the Code of Federal Regulations addressing the same issues. These agencies may adopt regulations different from these federal regulations upon a finding of one or more of the following justifications: (A) The differing state regulations are authorized by law and/or (B) The cost of differing state regulations is justified by the benefit to human health, public safety, public welfare, or the environment.

N/A