Date: October 6, 2025

To: Stoyan Bumbalov, Executive Director
         California Building Standards Commission
         stoyan.bumbalov@dgs.ca.gov

From: California Building Industry Association
         California Apartment Association
         California Business Properties Association
         Building Owners & Managers Association

RE: **Industry Coalition Support for:**
         Office of the State Fire Marshal Emergency Express Terms
         (SFM EF 01-25) 2025 California Wildland-Urban Interface Code, Title 24, Part 7

The trade associations cited above, the Industry Coalition, represent California's residential and non-residential construction and management industries. The Industry Coalition supports the California Building Standards Commission's adoption of the Office of the State Fire Marshal's (SFM) Emergency Express Terms (SFM EF 01-25).

The basis for much of this SFM Emergency proposal is required by SB 43 (Stern), wildfire safety legislation passed in 2021 and supported by industry.

Currently, the SFM's Wildland-Urban Interface Building Standards (WUI) apply to areas designated as moderate, high, and very high fire severity zones in State Responsibility Areas (SRAs), and to the very high fire severity zones in the Local Responsibility Areas (LRAs).

SB 63 requires the SFM to expand the application of its Wildland-Urban Interface Building Standards (WUI) to areas of California designated as **High** Fire Severity Zones in Local Responsibility Areas (LRAs). The SFM's emergency package accomplishes this task.

Additionally, the SFM has identified several application provisions in the existing standards that conflict with SB 63's intent and create confusion in the field. Specifically:

- **Section 101.3.1.1 Application Date and Where Required, and**
  Section 101.3.1.1 Exception 1: This old (and redundant) language indicates that the WUI building standards apply to construction for which the permit application was submitted to the building department on or after July 1, 2008 (when the first set of WUI standards took effect). Given that the SFM has updated the standards numerous times since, the continued reference to July 1, 2008, is confusing and outdated. The Industry Coalition supports the clarification being made by the SFM regarding this language.

- **Section 101.3.1 Application: Exception 5:** This old provision provided an exception from compliance with the SFM WUI building standards for "*Additions to and remodels of buildings originally constructed prior to July 1, 2008.*" This exception is in direct conflict with the clarification provided in Section 101.5 Additions or Alterations (highlighted portion), which states:

   > ***101.5 Additions or alterations.*** *Additions or alterations shall be permitted to be made to any building or structure without requiring the existing building or structure to comply with all of the requirements of this code,* ==*provided that the addition or alteration conforms to that required for a new building or structure*==*.*

   In addition to conflicting with other application provisions, Exception 5 also conflicts with the SFM's efforts to promote home hardening retrofits in California's existing communities. These retrofits are desperately needed as California leaders seek to address the ongoing insurance crisis. The Industry Coalition supports the SFM's deletion of this language.

- **Section 504.3.1 Protection of Open Eaves:** A clerical error occurred during the initial adoption of the new Part 7 (California Wildland-Urban Interface Code). The SFM addresses this error by deleting the language "*2-inch nominal dimension lumber.*" The Industry Coalition supports the SFM's deletion of this language.

While we would like the SFM to consider other refinements to the WUI application provisions, we understand that time is short, so we will continue to work with the SFM WUI Task Force on potential code changes for consideration during later adoption cycles.

In closing, the Industry Coalition supports the Office of the State Fire Marshal's Emergency Building Standards proposal (SFM EF 01-25) and respectfully urges the California Building Standards Commission to adopt this package.