



October 6, 2025

California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833  
[cbssc@dgs.ca.gov](mailto:cbssc@dgs.ca.gov)

**Re: REALTORS® Comments on Emergency Adoption of Part 7, Title 24 (SFM EF 01-25)**

To Whom It May Concern:

The California Association of REALTORS® appreciates the opportunity to comment on the State Fire Marshal's proposed emergency amendments to Title 24, Part 7 (SFM EF 01-25) related to the implementation of SB 63 (2021), and in alignment with the updated 2025 Fire Hazard Severity Zone maps, which seeks to correct errors in the Wildland-Urban Interface (WUI) Code.

As currently drafted, the emergency regulations seek to impose immediate, far-reaching compliance obligations on existing homeowners that will not be workable without a defined implementation plan that must include clear guidance for property owner education and outreach. The regulations propose to eliminate permit-date carve-outs for any addition, alteration, or repair in High and Very High Fire Hazard Severity Zones, which would be instead required to comply with current WUI standards pursuant to Health and Safety Code §17922(d). Additionally, the emergency regulation establishes a new definition of "home-hardening" to ensure eaves and rafter tails are included within the exemptions from the 5-year pause on most state and local Title 24 updates, which was signed into law by the Governor on June 30, 2025 (AB 130, Chapter 22, Statutes of 2025). While these changes are intended to improve fire safety, moving them into effect without a transition risks confusion, inconsistent enforcement, and affordability impacts.

As a result, these draft regulations will dramatically increase the cost of common property owner renovation projects (i.e., roof replacements, siding, windows, etc.). While C.A.R. recognizes the importance of wildfire safety and supports efforts to educate homeowners about the value of ember resistant construction and property improvements; C.A.R. remains concerned that over the last two decades Title 24 renovation standards compelling compliance for energy efficiency improvements for existing structures at time of permit issuance has had massive unintended consequences. Not only has the permit process become more expensive and cumbersome, every mandate placed on property owners which imposes significant costs for compliance serves to create larger underground economy to not only avoid compliance through permitting, which is a significant concern for the state's efforts to create fire resistant communities, but exposes property owners to additional risks from unscrupulous bad actors in the home renovation space.

C.A.R. respectfully requests that the emergency regulations be amended to:



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- 1) Delay implementation until January 1, 2027 to ensure time for outreach and education for both new construction and the renovation of existing homes;
- 2) Require implementation guidance be released within 90 days of the adoption of the emergency regulations that:
  - (a) clearly explains how the rules apply to additions, alterations, and repairs;
  - (b) provides cost-impact examples and plan-check scenarios; and
  - (c) directs uniform statewide enforcement and homeowner outreach. Homeowners and local officials cannot be expected to comply effectively without clear, timely direction; and
- 3) Include incentives and rebates to homeowners seeking to be early adopters complying with home hardening standards prescribed in the emergency regulations.

California REALTORS® support fire safety and resilient communities, but these rules must be implemented in a way that is practical, affordable, and consistently applied. Requiring the guidance to be released within 90 days of the emergency regulations adoption, combined with a one-year delayed implementation of the regulations application to new construction and renovations will help the state meet its wildfire-resilience goals while avoiding unnecessary disruption or financial burdens for homeowners. Furthermore, mirroring timelines used for other fire-hardening measures will allow builders, homeowners, and local governments to adjust plans, permitting processes, and inspection practices. Without this adjustment, in-flight projects could be disrupted midstream, creating unnecessary financial hardship—including for families rebuilding after wildfire events.

Thank you for considering our comments. We look forward to working with the Commission and the State Fire Marshal to achieve both safety and housing affordability. Please feel free to contact me at [kevinr@car.org](mailto:kevinr@car.org) with any questions related to the concerns enumerated in this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Rodgers'.

Kevin Rodgers  
Regulatory Advocate



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