

**ADDITIONAL 15-DAY EXPRESS TERMS AND RATIONALE  
FOR PROPOSED BUILDING STANDARDS  
OF THE STATE FIRE MARSHAL  
REGARDING THE 2025 CALIFORNIA WILDLAND-URBAN INTERFACE CODE,  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 7  
(SFM 04/25)**

Government Code Section 11346.8(c) states no state agency may adopt, amend, or repeal a regulation which has been changed from that which was originally made available to the public pursuant to Government Code Section 11346.5, unless the change is (1) non-substantial or solely grammatical in nature, or (2) sufficiently related to the original text that the public was adequately placed on notice that the change could result from the originally proposed regulatory action. If a sufficiently related change is made, the full text of the resulting adoption, amendment, or repeal, with the change clearly indicated, shall be made available to the public for at least 15 days before the agency adopts, amends, or repeals the resulting regulation.

Any written comments received regarding the change must be responded to in the final statement of reasons required by Government Code Section 11346.9.

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If using assistive technology, please adjust your settings to recognize underline, strikeout, double strikeout, italics and ellipsis. Double underline will be indicated by parenthetical notes within the text. The notes will not be codified or published in the code.

**LEGEND for EXPRESS TERMS (Based on model codes - Parts 2, 2.5, 3, 4, 5, 7, 9, 10)**

- Model Code language appears upright.
- Existing California amendments appear in *italic*
- California 45-day amendments appear in underline and italic, ~~strikeout and italic~~, and upright and in ~~strikeout~~.
- California additional 15-day amendments appear in double underline and italic, ~~double strikeout and italic~~, and upright and in ~~double strikeout~~.
- Ellipses (...) indicate existing text remains unchanged.
- **Rationale:** The justification for the change is shown after each section or series of related changes.

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**ADDITIONAL 15-DAY EXPRESS TERMS**

**ITEM 4**

**Chapter 5, Special Building Construction Regulations**

**SUB-ITEM 4-8**

**Section 504.5 Exterior Walls**

[SFM proposes to make editorial corrections and to provide clarity of the intent of the regulations.]

**504.5 Exterior walls.** Exterior walls of buildings or structures shall comply with one of

the following:

1. Exterior wall construction in accordance with section 504.5.1, or
2. Exterior wall coverings in accordance with section 504.5.2 ~~applied over exterior wall assemblies.~~

~~Where exterior walls are constructed using ignition resistant building materials in accordance with section 503.2, an exterior wall covering complying with section 504.5.2 shall not be required.~~

~~be constructed with one or more of the following methods, unless they are covered with an exterior wall covering complying with Section 504.5.2 and 504.5.2.1:~~

- ~~1. 1-hour fire-resistance-rated construction on the exterior side.~~
- ~~2. Noncombustible materials.~~
- ~~3. Heavy timber. Assembly of sawn lumber or glue-laminated wood with the smallest minimum nominal dimension of 4 inches (102 mm). Sawn or glue-laminated planks splined, tongue-and-groove or set close together and well spiked.~~
- ~~4. Log wall construction.~~
- ~~5. Wall assemblies that have been tested in accordance with the test procedures for a 10-minute direct flame contact exposure test set forth in ASTM E2707 with the conditions of acceptance shown in Section 504.9.3.~~
- ~~6. Wall assemblies that meet the performance criteria in accordance with the test procedures for a 10-minute direct flame contact exposure test set forth in SFM Standard 12-7A-1.~~
- ~~7. Wall assemblies suitable for exterior fire exposure containing one layer of 5/8-inch (15.9 mm) Type X gypsum sheathing applied behind the exterior wall covering or cladding on the exterior side of the framing.~~
- ~~8. Wall assemblies suitable for exterior fire exposure with a 1-hour fire-resistance rating, rated from the exterior side, as tested in accordance with ASTM E119 or UL 263.~~
- ~~9. Fire-retardant-treated wood labeled for exterior use and complying with Section 2303.2 of the California Building Code.~~

~~Such material shall extend from the top of the foundation to the underside of the roof sheathing~~

**504.5.1 Exterior wall construction.** Exterior walls of buildings or structures shall be constructed using one or more methods:

1. [begin double underline] Noncombustible materials. [end double underline]
2. 1-hour fire-resistance-rated construction [begin double underline], rated from the exterior side [end double underline].
3. Ignition-resistant building materials in accordance with Section 503.2.
4. Assembly of sawn lumber, cross-laminated timber or glue-laminated wood with the smallest minimum nominal dimension of 4 inches (102 mm). Sawn or glue-

laminated planks shall be splined, tongue-and-groove or set close together and well spiked.

5. Log wall construction.

6. Wall assemblies tested in accordance with ASTM E2707 for a 10-minute direct flame contact exposure test meeting the acceptance criteria in Section 504.9.3.

7. Wall assemblies tested in accordance with SFM-7A-1 and meeting the performance criteria for a 10-minute direct flame contact exposure test.

Such materials shall extend from the top of the foundation to the underside of the roof sheathing.

**504.5.2 Exterior wall coverings.** Exterior wall coverings shall comply with one or more of the following requirements and shall be installed in accordance with the manufacturer's [begin double underline] manufacturer's [end double underline] installation instructions:

1. Noncombustible material.
2. Ignition-resistant building material labeled for exterior use.
3. Fire-retardant-treated wood labeled for exterior use and complying with the requirements of Section 2303.2 of the California Building Code.
4. Fire-retardant-treated wood shingles and shakes which have been qualified in accordance with Section 1505.6 of the California Building Code for use as "Class B" roof covering shall be an acceptable alternative wall covering material where installed over solid sheathing.

~~Exterior wall coverings shall not reduce the fire performance of wall assemblies required by section 504.5.1.~~

~~**Exception:** Exterior wall coverings which are a component of an approved wall assembly complying with Section 504.5.~~

#### **504.5.2.1 Extent of exterior wall covering. ...**

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**504.5.1 504.5.3 Flashing.** A minimum of 6 inches (152 mm) of metal flashing or noncombustible material applied vertically on the exterior of the wall shall be installed at ~~the ground, decking, deck and roof intersections.~~ [begin double underline] the base of an exterior wall at intersections between the ground, roofs, decks, and other horizontal components attached to the wall. [end double underline]

#### **Rationale:**

Based on the public comments received, the regulations contained conflicting statements. These changes provide clarity and a clear path to compliance.

Section 504.5 proposal is amended by deleting the explanatory language in brackets and "applied over exterior wall assemblies", which were in conflict with the reason statement for section 504.5, which states 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 is further amended to remove the proposed text at the end of the section, which was creating confusion and conflict with the statement of reason.

Section 504.5.1, item #1 was amended to add “rated from the exterior side” to provide additional clarity and to be consistent with the language that was in the previous section 504.5 item #1.

Section 504.5.2 was amended to delete the provision stating that the covering cannot compromise the wall's rating. This is already required in the CBC section 703.2.1.4.

Section 504.5.2 is amended editorially to correct grammar.

Section 504.5.3 was amended to clarify that the flashing shall be applied at the base of the wall and vertically at the intersections.

### Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.

## SUB-ITEM 4-12

### Section 504.10.1 Vent testing

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

**504.10.1 Performance requirements Vent testing.** Ventilation openings shall be fully covered with ~~Wildfire Flame and Ember Resistant vents approved and listed by the California State Fire Marshal, or WUI vents tested [begin double underline] and listed [end double underline]~~ in accordance with ASTM E2886, to demonstrate compliance with all the following requirements:

1. There shall be no flaming ignition of the cotton material during the Ember Intrusion Test of ASTM E2886.
2. The Flame Intrusion Tests of ASTM E2886 shall be conducted in both the horizontal and vertical orientations.
- ~~2.3.~~ There shall be no flaming ignition during the Integrity Test portion of the Flame Intrusion Test.
4. The maximum temperature of the unexposed side of the vent shall not exceed 662°F (350°C).

**Rationale:**

The proposed language inadvertently removes the requirement for tested products to be listed. Listing a product provides an important quality assurance mechanism by verifying continued compliance with the test standard. The word “listed” is added back into the requirements.

**Notation:**

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

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