

**NOTICE OF PROPOSED ACTION  
TO 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)**

Notice is hereby given that the California Building Standards Commission (CBSC), on behalf of the Office of the State Fire Marshal (SFM), proposes to adopt, approve, codify, and publish changes to building standards contained in the California Code of Regulations (CCR), Title 24, Part 7. The SFM proposes building standards related to safeguarding life and property from the intrusion of fire and preventing structure fires from spreading to wildland fuels.

**PUBLIC COMMENT PERIOD**

Reference: Government Code Sections 11346.5(a)(1), 11346.5(a)(15) and 11346.5(a)(17).

A public hearing has not been scheduled; however, written comments will be accepted from **April 3, 2026**, until midnight on **May 18, 2026**.

Comments may be submitted to CBSC via:

Email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)

US Mail postmarked no later than **May 18, 2026**:

California Building Standards Commission  
Attention: Public Comments  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

All written comments received are considered part of the public record and will be made available for public inspection via [CBSC's website](#). Public comments may include personally identifiable information (PII) such as name, email address, or mailing address. Interested persons are not required to submit their PII to comment on this rulemaking. However, any PII submitted is subject to posting on the publicly accessible [CBSC website](#) without redaction. Also, only comments received in an accessible format will be viewable on CBSC's website. Non-accessible comments will be listed on the website and made available upon request. Any interested person, or his or her duly authorized representative, may request, no later than 15 days prior to the closing of the written comment period, that a public hearing be held.

The public will have an opportunity to provide written and oral comments regarding the proposed action on building standards at a public meeting to be conducted by CBSC, to be scheduled at a date near the end of the current adoption cycle. A meeting notice will be issued announcing the date, time, and location of the public meeting.

**POST-HEARING MODIFICATIONS TO THE TEXT OF THE REGULATIONS**

Reference: Government Code Section 11346.5(a)(18).

Following the public comment period, CBSC may adopt the proposed building standards substantially as proposed in this notice or with modifications that are sufficiently related to the original proposed text and notice of proposed changes. If modifications are made, the full text of the proposed modifications, clearly indicated, will be made available to the

public for at least 15 days prior to the date on which CBSC adopts, amends, or repeals the regulation(s). CBSC will accept written comments on the modified building standards during the 15-day period.

NOTE: To be notified of any modifications, you must submit written/oral comments or request that you be notified of any modifications.

## **AUTHORITY AND REFERENCE**

Reference: Government Code Section 11346.5(a)(2).

CBSC proposes to adopt these building standards under the authority granted by Health and Safety Code Section 18949.2. The purpose of these building standards is to implement, interpret, or make specific provisions of 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.

The SFM is proposing this regulatory action based on 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.

## **INFORMATIVE DIGEST**

Reference: Government Code Section 11346.5(a)(3).

### **Health and Safety Code Section 1250**

As used in this chapter, “health facility” means a facility, place, or building that is organized, maintained, and operated for the diagnosis, care, prevention, and treatment of human illness, physical or mental, including convalescence and rehabilitation and including care during and after pregnancy, or for any one or more of these purposes, for one or more persons, to which the persons are admitted for a 24-hour stay or longer.

### **Health and Safety Code Section 1502**

General provisions and Definitions for the California Community Care Facilities Act

### **Health and Safety Code Section 1568.02, 1569.70 through 1569.74**

General provisions and Levels of Care for Residential Care Facilities for the Elderly

### **Health and Safety Code Section 1597.44 through 1597.65**

General and Licensing provisions for Family Day Care

### **Health and Safety Code Section 13108 (a).**

The State Fire Marshal shall prepare and adopt building standards related to the means of egress, the installation of fire alarms, and fire extinguishing systems in any state-owned building or in any state-occupied building.

### **Health and Safety Code Section 13108.5.**

(a) The State Fire Marshal, in consultation with the Director of Forestry and Fire Protection and the Director of Housing and Community Development, shall, pursuant to Section 18930, propose fire protection building standards for roofs,

exterior walls, structure projections, including, but not limited to, porches, decks, balconies, and eaves, and structure openings, including, but not limited to, attic and eave vents and windows of buildings in fire hazard severity zones, including very high fire hazard severity zones designated by the Director of Forestry and Fire Protection pursuant to Article 9 (commencing with Section 4201) of Chapter 1 of Part 2 of Division 4 of the Public Resources Code.

**Health and Safety Code Section 13113.**

An automatic sprinkler system shall be installed in all 24-hour institutional-type occupancies and homes for the care of aged or senile persons.

**Health and Safety Code Section 13113.5.**

The State Fire Marshal shall adopt regulations requiring the installation of automatic smoke detectors in all facilities that provide 24-hour care, house six or fewer persons, and do not have automatic sprinkler systems.

**Health and Safety Code Section 13114 (a).**

The State Fire Marshal shall adopt regulations and standards to control the quality and installation of fire alarm systems and fire alarm devices marketed, distributed, offered for sale, or sold in this state, and that no person shall market, distribute, offer for sale, or sell any fire alarm system or fire alarm device in this state unless the system or device has been approved and listed by the State Fire Marshal.

**Health and Safety Code Section 13132.**

Every person, firm, or corporation maintaining or operating any facility for the care of the mentally handicapped shall file a statement with the fire authority having jurisdiction within five days of the admission or readmission of a patient, stating that such patient is either an ambulatory or a non-ambulatory person, and enumerating the reasons for such classification. Such a statement shall also be filed for each existing patient within 30 days of the effective date of this section.

Any statement required to be filed pursuant to this section shall be certified as to its correctness by the person attending such patient.

It shall be unlawful for any person, firm, or corporation required to file a statement pursuant to this section to include false statements therein. Any such act shall be in violation of this section and subject to the provisions of Section 13112.

**Health and Safety Code Section 13132.7.**

Shall require fire-retardant roof coverings in fire hazard severity zones.

**Health and Safety Code Section 13133 (a).**

The State Fire Marshal shall develop and adopt regulations establishing new occupancy classifications and specific fire safety standards appropriate for residential facilities and residential care facilities for the elderly. These fire safety standards shall apply uniformly throughout the state.

**Health and Safety Code Section 13135.**

The State Fire Marshal shall adopt regulations for alcoholism or drug abuse recovery or treatment facilities based on whether the residents or patients of the facilities are non-ambulatory.

**Health and Safety Code Section 13143.**

Grants the State Fire Marshal authority to prepare and adopt regulations establishing minimum requirements for the prevention of fire and for the protection of life and property against fire and panic in any building or structure used or intended for use as an asylum, jail, mental hospital, hospital, home for the elderly, children's nursery, children's home or institution not otherwise excluded from the coverage of this subdivision, school, or any similar occupancy of any capacity, and in any assembly occupancy where 50 or more persons may gather together in a building, room, or structure for amusement, entertainment, instruction, deliberation, worship, drinking or dining, awaiting transportation, or education.

**Health and Safety Code Section 13143.1 (a).**

The State Fire Marshal shall prepare, adopt, and submit building standards for establishing minimum requirements for the prevention of fire and for the protection of life and property against fire and panic in any motion picture or television production facility.

**Health and Safety Code Section 13143.2.**

The State Fire Marshal shall enforce building standards published in the California Building Standards Code and those other rules and regulations adopted by the State Fire Marshal for the provision of structural fire safety and fire-resistant exits in multiple-story structures existing on January 1, 1975, for human habitation, including, and limited to, apartment houses, hotels, and motels wherein rooms used for sleeping are above the ground floor.

**Health and Safety Code Section 13143.6 (a).**

The State Fire Marshal shall prepare and adopt regulations establishing minimum standards for the prevention of fire and for the protection of life and property against fire in any building or structure used intended for use as a home or institution for the housing of any person of any age for protective social care and supervision services by any governmental agency, certified family care homes, out-of-home placement facilities, and halfway houses.

**Health and Safety Code Section 13143.9.**

The State Fire Marshal shall establish minimum requirements for the storage, handling, and use of hazardous materials.

**Health and Safety Code Section 13145.**

The State Fire Marshal, the chief of any city, county, or city and county fire department or district providing fire protection services, or a Designated Campus Fire Marshal, and their authorized representatives, shall enforce in their respective areas building standards relating to fire and panic safety adopted by the State Fire Marshal and published in the California Building Standards Code and other regulations that the State Fire Marshal has formally adopted for the prevention of fire or for the protection of life and property against fire or panic.

**Health and Safety Code Section 13146.**

(a) The responsibility for enforcement of building standards adopted by the State Fire Marshal and published in the California Building Standards Code relating to fire and panic safety and other regulations of the State Fire Marshal shall be as follows:

(1) The city, county, or city and county with jurisdiction in the area affected by the standard or regulation shall delegate the enforcement of the building standards relating to fire and panic safety and other regulations of the State Fire Marshal as they relate to R-3 dwellings, as described in Section 310.5 of Part 2 of the California Building Standards Code, to either of the following:

(A) The chief of the fire authority of the city, county, or city and county, or the chief's authorized representative.

(B) The chief building official of the city, county, or city and county, or the official's authorized representative.

**Health and Safety Code Section 13210.**

(a) "Existing high-rise structure" means a high-rise structure, the construction of which is commenced or completed prior to July 1, 1974.

(b) "High-rise structure" means every building of any type of construction or occupancy having floors used for human occupancy located more than 75 feet above the lowest floor level having building access, except buildings used as hospitals, as defined in Section 1250.

(c) "New high-rise structure" means a high-rise structure, the construction of which is commenced on or after July 1, 1974.

**Health and Safety Code Section 13211.**

The State Fire Marshal shall prepare and adopt building standards relating to fire and panic safety in high-rise structures.

**Health and Safety Code Section 16022.5.**

Following the completion of the construction of a state-owned or state-occupied essential services building, the State Fire Marshal may conduct regular inspections of those buildings to ensure compliance with building standards related to fire and panic safety.

**Health and Safety Code Section 17921 (b).**

The State Fire Marshal shall adopt, amend, or repeal and submit building standards for approval pursuant to the provisions of Chapter 4 (commencing with Section 18935) of Part 2.5, and the State Fire Marshal shall adopt, amend, and repeal other rules and regulations for fire and panic safety in all hotels, motels, lodging houses, apartment houses and dwellings, buildings, and structures accessory thereto. These building standards and regulations shall be enforced pursuant to Sections 13145 and 13146; however, this section is not intended to require an inspection by a local fire agency of each single-family dwelling prior to its occupancy.

**Health and Safety Code Section 18928 (a).**

Requires each state agency to adopt or propose the adoption of a model code, national standards, or specification that shall reference the most recent edition of applicable model codes, national standards, or specifications.

**Health and Safety Code Section 18949.2**

(a) Any responsibilities of the State Fire Marshal to adopt, through a formal rulemaking process as provided in Chapter 3.5 (commencing with Section 11340) of

Part 1 of Division 3 of Title 2 of the Government Code, relating to building standards, including, but not limited to, Sections 13108, 13143, 13143.6, and 13211, are hereby transferred to the commission.

(b) The State Fire Marshal shall remain the state agency responsible for developing building standards to implement the state's fire and life safety policy. In its role as the fire and life safety standard developing agency, the State Fire Marshal shall continue its existing activities and forums designed to facilitate compromise and consensus among the various individuals and groups involved in developing the state's codes related to fire and life safety.

(c) The state's fire and life safety building standards, as developed by the State Fire Marshal and as adopted by the commission, shall continue to be based on the state's fire and life safety policy goals and mandates as they existed prior to the enactment of this chapter and as they are amended.

**Health and Safety Code Section 25500 through 25545.**

(a) The Legislature declares that, to protect the public health and safety and the environment, it is necessary to establish business and area plans relating to the handling and release or threatened release of hazardous materials. The establishment of a statewide environmental reporting system for these plans is a statewide requirement. Basic information on the location, type, quantity, and health risks of hazardous materials handled, used, stored, or disposed of in the state, which could be accidentally released into the environment, is required to be submitted to firefighters, health officials, planners, public safety officers, health care providers, regulatory agencies, and other interested persons. The information provided by business and area plans is necessary to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment.

**Government Code Section 51176 through 51179.**

The purpose of this chapter is to classify lands in the state in accordance with whether a very high fire hazard is present so that public officials can identify measures that will retard the rate of spread, and reduce the potential intensity, of uncontrolled fires that threaten to destroy resources, life, or property, and to require that those measures be taken.

**Government Code Section 51189.**

No later than January 31, 2020, the State Fire Marshal, in consultation with the director and the Director of Housing and Community Development, shall, pursuant to Section 18930 of the Health and Safety Code, recommend updated building standards that provide for comprehensive site and structure fire risk reduction to protect structures from fires spreading from adjacent structures or vegetation and to protect vegetation from fires spreading from adjacent structures, based on information learned from the 2017 wildfire season.

**Public Education Code 17074.50.**

(a) On and after July 1, 2002, all new construction projects submitted to the Division of the State Architect pursuant to this chapter, including, but not limited to, hardship applications, that require the approval of the Department of General Services shall

include an automatic fire detection, alarm, and sprinkler system as set forth in Section 17074.52 and approved by the State Fire Marshal.

### **Public Resources Code 4201 through 4204**

The purpose of this article is to provide for the classification of lands within state responsibility areas in accordance with the severity of fire hazard present for the purpose of identifying measures to be taken to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

### **Summary of Existing Regulations**

The SFM currently adopts, by reference, the 2024 International Wildland-Urban Interface Code, with SFM amendments as the 2025 California Wildland-Urban Interface Code that safeguard life and property from the intrusion of fire and prevent structure fires from spreading to wildland fuels. The provisions establish minimum requirements for the prevention of fire and for the protection of life and property against fire and in any building or structure used or intended for use as defined in each of the Health and Safety Code references shown above.

### **Summary of Effect**

The general purpose of this proposed action is principally intended to adopt/amend/repeal specific provisions in the 2025 California Wildland-Urban Interface Code (California Code of Regulations, Title 24, Part 7) based upon updated information or recent actions of the SFM.

This proposed action:

- Repeal certain amendments to the 2025 California Wildland-Urban Interface Code that are no longer necessary or justified pursuant to Health and Safety Code 18930(a)(7).
- Adopt and implement additional necessary amendments to the 2025 California Wildland-Urban Interface Code as they pertain to California laws.
- Codify non-substantive editorial and formatting amendments to the 2025 California Wildland-Urban Interface Code.

Proposed changes include:

- Cleaned up application and purpose
- Removed the exception for buildings built before 2008 and for additions and remodels
- Proposed definition of Home Hardening
- Add a definition of “Glazed Door”
- Clean up the definition of Wildland Urban Interface Area
- Clean up Ignition resistant section 503 for better understanding of the listing standards
- Exterior Wall and exterior covering- closed gaps and loopholes

- Added criteria for vent to be tested in both directions
- Added NFPA 1140 as a reference standard

### **Comparable Federal Statute or Regulations**

The SFM has determined that there are no comparable federal regulations or statutes addressing the fire and life safety requirements as presented in this notice.

### **Policy Statement Overview**

The specific purpose of this rulemaking effort by the SFM is to comply with Health and Safety Code section 18929.1, which requires all proposed regulations to adhere to this section regarding the 18-month adoption cycle specifically.

The actions described above are reasonably necessary to carry out the purpose for which it is proposed. The rationale for these actions is to establish minimum requirements for safeguarding life and property from the intrusion of fire and preventing structure fires from spreading to wildland fuels.

The SFM further proposes to offer new amendments where necessary to ensure that the regulations of the California Wildland-Urban Interface Code establish and or maintain minimum requirements for the prevention of fire and panic for the protection of life and property against fire and panic in any building or structure used or intended for use as defined in each of the Health and Safety Code references shown above. These proposals are aligned with Health and Safety Code Section 18942 (2)(C).

### **Evaluation of Consistency**

The proposed regulations are consistent with existing state regulations.

### **OTHER MATTERS PRESCRIBED BY STATUTE APPLICABLE TO THE AGENCY OR TO ANY SPECIFIC REGULATION OR CLASS OF REGULATIONS**

Reference: Government Code Section 11346.5(a)(4).

The SFM has determined that there are no other prescribed statutes, specific regulations, or classes of regulations applicable to the amendments and building standards related to the 2025 California Wildland-Urban Interface Code.

### **MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS**

Reference: Government Code Section 11346.5(a)(5).

SFM has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts.

### **ESTIMATE OF COST OR SAVINGS**

Reference: Government Code Section 11346.5(a)(6).

An estimate, prepared in accordance with instructions adopted by the Department of Finance, of costs or savings to any state agency, local agency, or school district.

- A. Cost or Savings to any state agency: **NO**
- B. Cost to any local agency required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **NO**

- C. Cost to any school district required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **NO**
- D. Other nondiscretionary costs or savings imposed on local agencies: **NO**
- E. Cost or savings in federal funding to the state: **NO**

Estimate: 0

## **INITIAL DETERMINATION OF NO SIGNIFICANT STATEWIDE ADVERSE ECONOMIC IMPACT ON BUSINESSES**

Reference: Government Code Section 11346.5(a)(8).

If the agency makes an initial determination that the adoption/amendment/repeal of this regulation will not have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, it shall make a declaration to that effect.

SFM has made an initial determination that the adoption/amendment/repeal of this regulation will not have a significant statewide adverse economic impact on businesses, including the ability of California businesses to compete with businesses in other states.

### **Declaration of Evidence**

Reference: Government Code Section 11346.5(a)(8).

In making the declaration, the agency shall provide in the record of facts, evidence, documents, testimony, or other evidence that the agency relied upon to support its initial determination of no effect.

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. SFM did not receive any comments or indications that there would be a statewide adverse economic impact on businesses. SFM encourages anyone to submit comments supporting or opposing this statement.

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 interested parties as but not limited to state and local fire agencies, building officials, planners, industry experts, academic researchers, material manufacturers, insurance representatives, and community stakeholders.

### **WORK GROUP MEETINGS**

- Schedule
  - The work group shall meet “first Wednesday of the month.”
- Location
  - Meetings shall be regularly scheduled virtually
  - Meetings will not be canceled without cause
- Sub-Groups
  - May be formed to address specific technical topics.
  - Recommendations will be presented to the core work group for discussion and voting.

### **COST IMPACT ON REPRESENTATIVE PRIVATE PERSON OR BUSINESS**

Reference: Government Code Section 11346.5(a)(9).

Describe all cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

The SFM has evaluated the amendments to determine cost impacts that a representative private person or business would incur in reasonable compliance with the proposed amendments. The proposed amendments result in minimal cost impacts that will primarily be associated with design choices and building material selections necessary to meet the updated WUI requirements. These costs are expected to be limited in scope and apply only to new construction, alterations, or development activities already subject to WUI regulations.

The associated cost would be absorbed as part of normal construction, design, and permitting processes and would not constitute a significant burden.

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

Reference: Government Code Section 11346.5(a)(10).

The office of the State Fire Marshal 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.

**FINDING OF NECESSITY FOR THE PUBLIC'S HEALTH, SAFETY, OR WELFARE**

Reference: Government Code Section 11346.5(a)(11).

Any regulation that requires a report shall not apply to businesses unless the agency makes a finding that it is necessary for the health, safety, or welfare of the public that the regulations apply to businesses.

N/A

**ESTIMATED COST OF COMPLIANCE OF STANDARDS THAT WOULD IMPACT HOUSING**

Reference: Government Code Section 11346.5(a)(12).

**Assessment of Potential Impacts on Housing**

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 Housing Cost**

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”.

[Building a Wildfire-Resistant Home: Codes and Costs - Headwaters Economics](#)

This 2018 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        |
| <b>Subtotal</b> | <b>\$ 21,810</b> | <b>\$ 27,670</b>   | <b>\$ 5,860</b> |

| 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           |
| <b>Subtotal</b> | <b>\$ 48,380</b> | <b>\$ 36,190</b>   | <b>(\$ 12,190)</b> |

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

| ALL COMPONENTS | TYPICAL          | WILDFIRE-RESISTANT | DIFFERENCE         |
|----------------|------------------|--------------------|--------------------|
| <b>TOTAL</b>   | <b>\$ 79,920</b> | <b>\$ 75,440</b>   | <b>(\$ -4,480)</b> |

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        |

|                                |                 |                 |                 |                 |
|--------------------------------|-----------------|-----------------|-----------------|-----------------|
| <b>Total (+18% Inflation):</b> | <b>\$59,223</b> | <b>\$72,293</b> | <b>\$68,099</b> | <b>\$74,465</b> |
| 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 Cost

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:

$\$3,000 \times 18\% = \$540$  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

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

[In Major Move to Expand Growth, Farmers Insurance® to Remove Cap on Writing New Homeowners Insurance Policies in California and Submits New Rating Plan](#)

The adoption of the proposed changes in the code is expected to result in a minimal increase in housing costs for certain homes in California. These costs will have the most significant impact on single-family new construction built in designated Fire Hazard Severity Zones. They will vary depending on the degree to which a builder or homeowner must modify building construction materials and methods to comply with the code. Any potential savings, except for decreased homeowners' insurance, are theoretical and will be realized at some point in the future for specific homes or households that avoid property damage or personal injury as a result of complying with this code. However, irrespective of any potentially negative fiscal impacts, a core tenet of national, state, and local affordable housing policy is that affordable housing is safe and sanitary.

The SFM, in consultation with the Housing and Community Development Department (HCD), acknowledges and supports the value of the proposed regulations, considering them central to its mission, as well as promoting housing affordability.

## **CONSIDERATION OF ALTERNATIVES**

Reference: Government Code Section 11346.5(a)(13).

SFM has determined that the SFM has considered no reasonable alternative or that has otherwise been identified and brought to the attention of the SFM 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.

### **AVAILABILITY OF RULEMAKING DOCUMENTS**

Reference: Government Code Sections 11346.5(a)(16) and 11346.5(a)(20).

All of the information upon which the proposed regulations are based is contained in the rulemaking file, which is available for public review by contacting the person named below. This notice, the express terms, and initial statement of reasons can be accessed from the [CBSC website](https://dgs.ca.gov/BSC): [dgs.ca.gov/BSC](https://dgs.ca.gov/BSC).

Reference: Government Code Section 11346.5(a)(19).

Interested parties may obtain a copy of the final statement of reasons once it has been prepared by making a written request to the contact person named below or at the [CBSC website](https://www.dgs.ca.gov/en/BSC): <https://www.dgs.ca.gov/en/BSC>.

Reference: Government Code Section 11346.5(a)(21).

SFM shall provide, upon request, a description of proposed changes included in the proposed action, in the manner provided by Section 11346.6, to accommodate a person with a visual or other disability for which effective communication is required under state or federal law. The statement shall note that providing an accessible description of proposed changes may require extending the period of public comment for the proposed action.

### **CBSC CONTACT PERSON FOR PROCEDURAL AND ADMINISTRATIVE QUESTIONS**

Reference: Government Code Section 11346.5(a)(14).

General questions regarding procedural and administrative issues should be addressed to:

Kevin Day, Deputy Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833  
Telephone: (916) 263-0916

### **PROPOSING STATE AGENCY CONTACT PERSON FOR SUBSTANTIVE OR TECHNICAL QUESTIONS ON THE PROPOSED CHANGES TO BUILDING STANDARDS**

Specific questions regarding the substantive or technical aspects of the proposed changes to the building standards should be addressed to:

Primary Contact:

Crystal Sujeski, Division Chief  
CALFIRE / Office of the State Fire Marshal  
Code Development and Analysis Division  
916-568-2916  
[Crystal.Sujeski@fire.ca.gov](mailto:Crystal.Sujeski@fire.ca.gov)

Back up Contact:

Jena Garcia, Deputy State Fire Marshal III Specialist  
CALFIRE / Office of the State Fire Marshal

Code Development and Analysis Division  
916-531-7650  
Jena.Garcia@fire.ca.gov