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

Daniel Berlant, State Fire Marshal  
CAL FIRE Office of the State Fire Marshal  
daniel.berlant@fire.ca.gov

From: **California Code Professionals:**

Darcy Davidson, Fire Marshal / Division Chief  
Justin Gipson, Fire Marshal / Division Chief  
Kevin Reinertson, Retired Division Chief  
Larry Williams, Retired Assistant Fire Marshal  
Marty Walters, County Coordinator, Plumas County Fire Safe Council  
Robert Marshall, Deputy Fire Chief (Retired) San Mateo Consolidated Fire Department

**RE: SFM 04/25 – 2025 California Wildland-Urban Interface Code (CWUIC), Part 7 Office of the State Fire Marshal – 45-day public comment period for the Intervening Code Adoption Cycle.**

This public comment letter has been developed by several members who assisted in the development of the revisions to the 2025 CWUIC as the part of the Office of the State Fire Marshal (SFM) CWUIC Work Group, Sub-Group 6 and additional interested parties. In that group's work, members identified additional needs for clarifications and corrections regarding scope and applicability.

This public comment letter outlines several discrepancies identified during our review of the recently adopted CWUIC, including the Emergency Regulations that took effect January 1, 2026, and specifically the State Fire Marshal's Interim Rulemaking documents SFM 04/25. The scope and application of the code need to be clear and accurate, for proper application in accordance with Health and Safety Code 18930, Nine-Point Criteria 2, 3, 5, and 6.

We respectfully request the Office of the State Fire Marshal make further amendment to certain provisions contained in the interim rulemaking for the CWUIC that are specifically related to the Emergency Regulations adopted October 15, 2025, readopted May 6, 2026, and contained in this interim rulemaking cycle to certify and make permanent. These additional amendments are for clarity and application of Chapters 4 and 6, as they relate to the SFM 04/25 amendments proposed to Section 1.1.2 and specifically Sections 101.2 and 101.3.1 that introduce the application of the CWUIC to High Fire Hazard Severity Zones in the in Local Responsibility Area (LRA). We contend the additional amendments requested in this letter are substantially related to the SFM 04/25 proposals and should only necessitate an additional 15-day comment period.

## Requested Action:

The following outlines key issues concerning the scope, application, and definition of “Wildland-Urban Interface Area,” and presents proposed amendments to the 2025 CWUIC to ensure clarity, consistency and correct application of the code in accordance with current statute:

- Amend Chapter 1, Section 101.3.1 to maintain item 4 with modification for land in Local Responsibility Area (SFM 04/25 Item 1, Sub-Item 1-3)
- Amend Chapter 3 to add Section 302.3.1 “Local Fire Hazard Severity Zones” that correlates with the defined term “Fire Hazard Severity Zones’ for LRA with the posting and noticing requirements. (SFM 04/25 Item 3 Sub-Item 3-3, new proposal specifically related to SFM 04/25 Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6 (scope and application))
- Amend Chapter 4, Sections 402.1.1, 402.1.2, 402.2.1, 402.2.2, 403.1 to clearly delineate which “Fire Hazard Severity Zones” and/or “Wildland-Urban Interface Areas” are required to comply with the access and water supply provisions contained in the CWUIC or other regulations and standards, or local adoptive ordinances. (No SFM 04/25 Item, new amendments specifically related to SFM 04/25 Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6 (scope and application))
- Amend Chapter 5, Sections 501.1 and 503.1 to clearly delineate which “Fire Hazard Severity Zones” are required to comply with Chapter 5 Building Standards provisions (Section 501.1 is a new amendment and SFM 04/25 Item 4 Sub-Item 4-1 are specifically related to SFM 04/25 Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6 (scope and application))
- Amend Chapter 6, Section 601.1, 601.2 and 603.2 to clearly delineate which “Fire Hazard Severity Zones” are required to comply with Chapter 6, specifically Sections 603, 604, 607 through 612. (SFM 04/25 Item 5 no Sub-Item, new amendments specifically related to SFM 04/25 Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6 (scope and application))
- Additional modifications proposed to the Matrix Adoption Tables are provided to clarify the California Code of Regulations (CCR), Title 14, provisions are not specifically adopted by the State Fire Marshal. (No Item number referenced)

## Proposed amendments and specific rationale:

(Format reflects the proposal as shown in Express Terms including the gray highlight and notes from the emergency regulations. The proposed amendments to the rulemaking are shown highlighted in green, italic w/single ~~strikeout~~underline).

### ITEM 1

#### Chapter 1 Administration

#### SUB ITEM 1-3

**Division II, Section 101.3.1 Application and 101.3.1.1 Application date and where required**

**101.3.1 Application.** *New buildings and structures with residential, commercial, educational, institutional or similar occupancy type use, which shall be referred to in this code as “applicable buildings,” as well as new buildings and structures accessory to those applicable buildings, located in any of the following:*

- ~~1. All lands designated by the State Board of Forestry and Fire Protection as State Responsibility Area (SRA)~~
- ~~2. Lands in Local Responsibility Area (LRA) identified by the State Fire Marshal as High or Very High Fire Hazard Severity Zone.~~
- ~~3. Lands in the LRA designated as a High or Very-High Fire Hazard Severity Zone by a Local agency.~~
- ~~4. Land designated as a Wildland-Urban Interface Area by cities and other local agencies.~~  
**Land in Local Responsibility Area (LRA) designated by cities and other local agencies where required by local ordinance**

**Exceptions:**

- ~~1. Group U occupancy accessory buildings of any size located at least 50 feet (15 240 mm) from an applicable building on the same lot. [Exception 1 was added in the Emergency Regulations approved October 15, 2025, but it is proposed to be deleted in this certifying rulemaking.]~~
- ~~2. Group U occupancy agricultural buildings, as defined in Section 202 of the California Building Code of any size located at least 50 feet (15 240 mm) from an applicable building. [Exception 2 was added in the Emergency Regulations approved October 15, 2025, but is proposed to be deleted in this certifying rulemaking.]~~
- ~~3. Group C occupancy special buildings conforming to the limitations specified in Section 450.4.1 of the California Building Code.~~
- ~~4. New accessory buildings and miscellaneous structures specified in Section 504.11 shall comply only with the requirements of that section. [Exception 4 was added in the Emergency Regulations approved October 15, 2025, but it is proposed to be deleted in this certifying rulemaking.]~~

**Rationale:**

Section 101.3.1 Item 4 is proposed to be amended verse deleted. This amendment provides for additional areas designated by the local jurisdiction such as Moderate or other Fire Hazard Severity Zones in accordance with GC 51179(b)(2).

**ITEM 3**

**Chapter 3 Wildland-Urban Interface Areas**

**SUB ITEM 3-3**

**Section 302.3 Local Designation**

**302.3 Local designation.** *A local agency shall adopt by ordinance and designate moderate, high, and very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the State Fire Marshal. A local agency may, at its discretion, include areas not identified and may only increase the level of fire hazard severity in accordance with Government Code Section 51179.*

**302.3.1 Local Responsibility Area Fire Hazard Zones.** *In accordance with Government Code Section 51179, 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 Government Code Section 51178. If the agency amends the map, pursuant to subdivision (b) or (c) of Government Code Section 51179, the notice shall instead identify the location of the amended map.*

**Rationale:**

- The additional subsection is proposed to assist the local jurisdiction and correlate with proposed new section 302.1.1 that incorporates provisions from Government Code 51179. This is necessary as the roll out dates of the LRA maps were provided at 4 different dates in geographical locations throughout the state and local designation and adoption by ordinance occurred at different dates, versus the SRA map release date as noted in the definition of Fire Hazard Severity Zones.

**SFM 04/25 ITEM None, the requested modifications below are specifically and substantially related to Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6**

**Chapter 4 Wildland-Urban Interface Area Requirements**

**Section 402 Applicability**

**402.1 Subdivisions.** Subdivisions shall comply with Sections 402.1.1 and 402.1.2.

**402.1.1 Access.** New subdivisions, ~~as determined by this jurisdiction,~~ shall be provided with fire apparatus access roads ~~as follows:~~

- ~~1. in accordance; and All wildland-urban interface areas shall comply with the California Fire Code.~~
- ~~2. Fire hazard severity zones in the State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a Very High Fire Hazard Severity Zone shall also comply with the California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 2, Article 2; and access requirements in accordance with Section 403.~~

**402.1.2 Water supply.** New subdivisions ~~as determined by this jurisdiction~~ shall be provided with water supply ~~as follows:~~

- ~~1. in accordance All wildland-urban interface areas shall comply with Section 507 of the California Fire Code.~~
- ~~2. Fire hazard severity zones in the State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a Very High Fire Hazard Severity Zone shall also comply with the California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 2, Article 4; and Section 404.~~

**402.2 Individual structures.** Individual structures shall comply with Sections 402.2.1 and 402.2.2.

**402.2.1 Access.** Individual structures hereafter constructed or relocated into or within wildland-urban interface areas shall be provided with fire apparatus access ~~as follows:~~

- ~~1. in accordance All wildland-urban interface areas shall comply with the California Fire Code.~~
- ~~2. and Fire hazard severity zones in the State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a Very High Fire Hazard Severity Zone shall also comply with the California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 2, Subsection 1273; and Section 403.~~

**402.2.2 Water supply.** Individual structures hereafter constructed or relocated into or within wildland-urban interface areas shall be provided with a conforming water supply as follows:

1. in accordance *All wildland-urban interface areas shall comply* with *Section 507 of the California Fire Code.*

2. *Fire hazard severity zones in the State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a Very High Fire Hazard Severity Zone shall also comply with the California Code of Regulations, Title 14, Division 1.5, Chapter 7, Subchapter 2, Article 4, California Fire Code Section 507* and Section 404.

#### **Rationale:**

Sections 402.1.1 and 402.1.2 amended as follows:

- Removed “as determined by this jurisdiction” as it is not necessary

Sections 402.1.1, 402.1.2, 402.2.1 and 402.2.2 amended as follows:

- Sections now shown as items 1 and 2 to specify which zones are required to comply certain provisions as follows:
  - Item 1 requires all areas to comply with the CFC.
  - Item 2 specifies which zones are required to comply with Title 14 provisions in Sections 403 or 404, respectively (i.e. all SRA and only VHFHZ in the LRA), in addition to the CFC.

#### **Section 403 Access**

**403.1 General.** *Roads**In all Fire Hazard Severity Zones in State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a Very High Fire Hazard Severity Zone, roads and driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a wildfire emergency consistent 403.1.1 to 403.1.9. [CCR, Title 14 §1273.00]*

#### **Rationale:**

Language added to specify which FHSZ are required to comply with CCR, Title 14 Fire Safe Regulations for clarity.

#### **ITEM 4**

#### **Chapter 5 Special Building Construction Regulations**

**SUB ITEM None,** the requested modification below is specifically and substantially related to Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6

#### **Section 501 General**

**501.1 Scope.** Buildings and structures *in a wildland-urban interface area**all Fire Hazard Severity Zones in State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a High or Very High Fire Hazard Severity Zone* shall be constructed in accordance with California Building Code and this code.

#### **Exceptions:**

1. *Group U* accessory structures not exceeding 120 square feet (11 m<sup>2</sup>) in floor area where located not less than 50 feet (15 240 mm) from *applicable* buildings.

2. Group U agricultural buildings not less than 50 feet (15 240 mm) from applicable buildings.

**SUB-ITEM 4-1** The requested modification below is specifically and substantially related to Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6

## Section 503 and Section 503.1 General

### SECTION 503 ~~IGNITION-RESISTANT CONSTRUCTION AND MATERIAL~~

**503.1 General.** Buildings and structures hereafter constructed, modified or relocated into or within ~~wildland-urban interface areas~~ all Fire Hazard Severity Zone in State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a High or Very High Fire Hazard Severity Zone shall meet the construction requirements in accordance with Chapter 5. Materials required to be ignition-resistant building materials shall comply with the requirements of Section 503.2. Materials required to be fire-retardant-treated wood roof coverings shall comply with the requirements of Section 503.3. Where this code requires fire-resistance-rated construction, fire-resistance ratings shall be determined in accordance with Section 503.4.

#### **Exceptions:**

1. New accessory buildings and miscellaneous structures complying with Section 504.11.
- ~~2. Additions to and remodels of buildings originally constructed prior to July 1, 2008.~~
- ~~3. Group C occupancy special buildings conforming to the limitations specified in Section 450.4.1 of the California Building Code.~~

#### **Rationale:**

Sections 501.1 and 503.1 amended as follows:

- Removed the referenced definition of Wildland-Urban Interface Area.
- Language added to specify which FHSZ are required to comply with this chapter for specificity and clarity.
- These amendments primarily made for consistency with the SFM amendment to the defined term of Wildland-Urban Interface Area and the amendments proposed herein. These amendments may not be necessary with the amendments propose by the SFM and herein to Chapter 1 and the defined term of Wildland-Urban Interface Area.

**ITEM 5** None, however, the requested modifications below are specifically and substantially related to Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6

## Chapter 6 Fire Protection Requirements

### Section 601 General

**601.1 Scope.** The provisions of this chapter establish general requirements for new and existing buildings, structures and premises located within ~~Wildland-Urban Interface (WUI) areas~~ all Fire Hazard Severity Zones in State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a Very High Fire Hazard Severity Zone.

**601.2 Objective.** The objective of this chapter is to establish minimum requirements to mitigate conditions that might cause a fire originating in a structure to ignite vegetation in ~~the Wildland-Urban Interface (WUI) area~~ **all Fire Hazard Severity Zone in State Responsibility Areas (SRA), and Local Responsibility Areas (LRA) designated as a Very High Fire Hazard Severity Zone**, 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.

**Rationale:**

Sections 601.1 and 601.2 amended as follows:

- Removed the referenced definition of wildland-urban interface area as it includes LRA areas of High FHSZ in the LRA not currently statutorily or regulatory mandated to comply with the provisions of this chapter. Statutory and regulatory mandates for defensible space and vegetation management are limited to the SRA and LRA Very High FHSZ.
- Language added to specify which FHSZ are required to comply with this chapter for specificity and clarity.

**Section 603 vegetation Management**

**603.2 Application.** All new plantings of vegetation in State Responsibility Area (SRA) and Local Responsibility Areas (LRA) designated as a **Very High** Fire Hazard Severity Zone shall comply with Sections 603.3 through 603.4.2.1.

**Rationale:**

Language added to specify only the Very High FHSZ in the LRA is required to comply with this section for specificity and clarity. The defined term of Fire Hazard Severity Zone is too broad as it includes LRA areas of High FHSZ in the LRA not currently statutorily or regulatory mandated to comply with the provisions of this chapter. Furthermore, the defined term of “Fire Hazard Severity Zone” only included the SRA mapped areas and leads to confusion regarding the mapped LRA areas. Additional amendments have been proposed in this comment for the term “Fire Hazard Severity Zone”.

**Section 604 Maintenance Of Defensible Space**

**604.2 Application.** Buildings and structures located in the following areas shall maintain the required hazardous vegetation and fuel management:

1. All unincorporated lands designated as a State Responsibility Area (SRA).
2. Land designated as a Very High Fire Hazard Severity Zone by a city or local agency.
3. ~~Land designated in a city or local agency ordinance as a wildland-urban interface (WUI) area.~~ **Land in a Local Responsibility Area (LRA) designated by a city or local agency where required by local ordinance.**

**Rationale:**

- Removed the referenced definition of wildland-urban interface area as it includes LRA areas of High FHSZ not currently statutorily or regulatory mandated to comply with the provisions of Title 14 contained in this this section.
- Added language to include areas designated by a city or local agency where required by local ordinance.

**ITEM None, the requested modifications below are specifically and substantially related to Item 1 Sub-Items 1-1, 1-2, and 1-3, and Item 2 Sub-Items 2-3, 2-4, and 2-6**

**Matrix Adoption Tables**

**CHAPTER 1 – SCOPE AND ADMINISTRATION**

Adopting Agency	BSC	BSC- CG	SFM Title 24	SFM Title 19
Adopt Entire Chapter				
Adopt Entire Chapter as amended (amended sections listed below)				
Adopt only those sections that are listed below			X	
[California Code of Regulations, Title 19, Division I]				X
Chapter / Section				
<b>Division I</b>				
1.1.1 – 1.11.2.1.1			X	
T-19 Div 1 §1.11				X
T-19 Div 1 §1.12				X
1.11.2.1.2 – 1.11.2.2			X	
T-19 Div 1 §1.08				X
T-19 Div 1 §1.13				X
1.11.2.3 – 1.11.11			X	
T-19 Div 1 §1.03				X
T-19 Div 1 §1.09.1				X
1.12			†	
<b>Division II</b>				
No proposed amendments to Division II Matrix				

\*The California Code of Regulations (CCR), Title 19, Division 1 provisions that are found in the California Wildland-Urban Interface Code are a reprint from the current CCR, Title 19, Division 1 text for the code user's convenience only. The scope, applicability and appeals procedures of CCR, Title 19, Division I remain the same.

The state agency does not adopt sections identified by the following symbol: †  
 The Office of the State Fire Marshal's adoption of this chapter or individual sections is applicable to structures regulated by other state agencies pursuant to Section 1.11.

The California Code of Regulations (CCR), Title 14, Division 1.5 provisions that are found in the California Wildland-Urban Interface Code are not listed in the Matrix Adoption Tables as they are not within the State Fire Marshal's authority to adopt. These provisions are a reprint from the current CCR, Title 14, Division 1.5 text for the code user's convenience only and are identified in the body of the code by square brackets containing references to applicable Title 14 sections.

**CHAPTER 2 – DEFINITIONS**

Adopting Agency	BSC	BSC- CG	SFM Title 24	SFM Title 19
Adopt Entire Chapter				
Adopt Entire Chapter as amended (amended sections listed below)			X	
Adopt only those sections that are listed below				
Chapter / Section				
201.3			X	

Applicable Building			X	
Defensible Space			X+	
Exterior Wall Assembly			X	
Exterior Wall Covering			X	
Fire Hazard Severity Zones			X	
Fire Protection Plan			X	
Fire-smart Vegetation			X	
Flame Spread Index			X	
Fuel			X	
Fuel Modification			X	
Home Hardening			X	
Local Responsibility Area (LRA)			X	
Occupancy			X	
Rafter Tail			X	
Roof Eave			X	
Roof Eave Soffit			X	
State Responsibility Area (SRA)			X	
Strategic Ridgeline			X	
Structure			X	
Wildfire			X	
Wildfire Exposure			X	
Wildland-Urban Interface Area (WUI)			X	

Footnotes not shown for clarity as all footnotes are the same as Chapter 1 above without modification.

#### CHAPTER 4 – WILDLAND-URBAN INTERFACE AREA REQUIREMENTS

Adopting Agency	BSC	BSC- CG	SFM Title 24	SFM Title 19
Adopt Entire Chapter				
Adopt Entire Chapter as amended (amended sections listed below)			X	
Adopt only those sections that are listed below				
Chapter / Section				
402			X+	
402.1.1			X	
402.1.2			X	
402.1.2.1			X	
402.2.1			X	
402.2.2			X	
402.3			X	
403			+	
404.1			X	
404.2			X	
404.4			X	
404.5			X	
404.6 Reserved			X	
404.7			X	
404.8			X	

Footnotes not shown for clarity as all footnotes are the same as Chapter 1 above without modification.

#### CHAPTER 6 – FIRE PROTECTION REQUIREMENTS

Adopting Agency	BSC	BSC- CG	SFM Title 24	SFM Title 19
Adopt Entire Chapter				
Adopt Entire Chapter as amended (amended			X	

sections listed below)				
Adopt only those sections that are listed below				
Chapter / Section				
601.1 –			X	
601.2			X	
601.3			X†	
Defensible Space			†	
602.1 – 602.3.2			X	
603.1 – 603.4.2.1			X	
604.1			X	
604.2 – 604.4			X	
606.1			X	
606.3			X	
607.1			X	
608			†	
609			†	
610			X	
611			X	
612			X	

Footnotes not shown for clarity as all footnotes are the same as Chapter 1 above without modification.

**Rationale:**

Modifications proposed to the Matrix Adoption Tables are provided to clarify the California Code of Regulations (CCR), Title 14, provisions are not specifically adopted by the State Fire Marshal as outlined in the ISOR for the initial adoption of the 2025 CWUIC. Not having this clearly shown with the † symbol creates additional confusion as the Matrix Table shows the SFM adopting the entire chapter as amended.

Although there is a footnote that states such, it is very easy to miss, whether one is a seasoned user familiar with the California Codes or a user is not familiar.

Example: A user, familiar or not, reads the Chapter 4 Matrix Table and sees that the SFM has adopted the entire chapter as amended and they move on to Section 403.1 for the requirements. The general users read of that section it would appear as these provisions apply in any FHSZ SRA or LRA and the Title 14 reference at the end in brackets is just a reference. We believe that most users of the CWUIC including many AHJ will miss that that section is not adopted by the SFM and further enforce it, design to it, or not know what to do.

**Additional Background of Problem and Potential Impact:**

The recent SFM Emergency Rulemaking SFM EF 01-25, which implements Senate Bill 63 (2021) and extends certain CWUIC provisions to High Fire Hazard Severity Zones (FHSZ) within Local Responsibility Areas (LRA) and this Interim Rulemaking SFM 04/25, necessitates further clarification.

The proposed amendments to the defined term “Wildland-Urban Interface Area” by the SFM resolve many of our concerns. However, while the term is generally appropriate when referencing FHSZs (high, and very high) within both State Responsibility Areas (SRA) and Local Responsibility Areas (LRA), its application in specific sections—namely Sections 101.2, 101.3.1, and Chapters 4 (401.1 and 404.1), and 6 (601.1, 603.2) —erroneously mandates all CWUIC requirements in LRA High FHSZ. This is inconsistent with the intent and statutory authority of Government Code (GC) Sections 51179 and 51182, Health and Safety Code (HSC) Section

13108.5, Senate Bill 63 (2021), Public Resources Code (PRC) Sections 4290 and 4291, and CCR, Title 14 Fire Safe Regulations.

Government Code section 51179 requires local agencies to adopt an ordinance designating moderate, high, and very high fire hazard severity zones within their jurisdictions. Notwithstanding this mandate, the statute does not require that all regulations promulgated by the SFM or the Board of Forestry be applied universally to all LRA fire hazard severity zones.

Health and Safety Code section 13108.5 provides that “Building Standards” for construction are applicable within High and Very High FHSZs in the LRA.

Pursuant to Public Resources Code sections 4290 and 4291, as well as Government Code section 51182, requirements relating to defensible space, vegetation management, the establishment and maintenance of perimeters, ridgelines, fuel breaks, and greenbelts are mandated for lands designated as SRA and only those areas classified as Very High Fire Hazard Severity Zones within the LRA.

The California Code of Regulations, Title 14, Fire Safe Regulations, as promulgated by the Board of Forestry, apply to lands within the SRA and only to those areas designated as Very High Fire Hazard Severity Zones in the LRA.

Absent amendment, Sections 101.2 and 101.3.1 would extend the CWUIC in its entirety to LRA High FHSZs, including and specifically Chapters 4 and 6 that include requirements which are only applicable in the VHFHSZ. The proposed amendments in this document are intended to clarify where the CWUIC applies specifically to SRA and LRA Very High FHSZs, address the application of Building Standards to High FHSZs, and further address the adoption of Moderate and High FHSZs by local ordinance.

Similarly, Sections 402.1.1, 402.1.2, 402.2.1, and 402.2.2, if unamended, would apply the entire chapter 4 to LRA High FHSZs. While water supply requirements are correctly mandated statewide, access requirements are not adopted as Building Standards, as clarified by Attorney General Opinion 94-708, and remain subject to local jurisdiction. References to CCR, Title 14 in these sections render them applicable to both LRA High FHSZs. However, CCR, Title 14 Fire Safe Regulations are promulgated for the SRA and only the LRA Very High FHSZ.

Sections 601.1, 601.2, 603.2, 604.2, 608, and 609, if not amended, would similarly extend requirements to LRA High FHSZs. Statutory and regulatory mandates for defensible space and vegetation management are limited to the SRA and LRA Very High FHSZ, as outlined above and further delineated in the sections we request further modification to in the public comment letter.

We want to thank the State Fire Marshal and the efforts of the CWUIC Work Group, Work Group Chair and Co-Chairs, Sub-Group 6, and other stakeholders in the development of the SFM’s proposed amendments to the 2025 CWUIC (SFM 04/25). The organizations, stakeholders, and other interested parties involved play a vital role in the enforcement, permitting, inspection, application and development of the California Wildland-Urban Interface Code. We greatly appreciate your continued partnership and leadership on this important statewide initiative and look forward to the opportunity to collaborate on a clear, coordinated path forward.