

May 15, 2026

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

Re: 45-Day Express Terms for Proposed Building Standards of the Office of State Fire Marshal Regarding the 2025 California Wildland-Urban Interface Code, California Code of Regulations, Title 24, Part 7

To Whom it May Concern:

We offer the following comments on the proposed revisions to the 2025 California Wildland-Urban Interface Code:

- ◆ ~~At the beginning of Sub-Item 4-8, this sentence is not part of the mandatory provisions of Section 504.5, and it is incorrect, as it conflicts with the mandatory provisions of 504.5. [The Exterior wall sections are designed to work together, and compliance is achieved when the exterior wall complies with both the exterior wall construction provisions and the exterior wall covering provisions.]~~
- ◆ ~~At the end of Item 2 in Section 504.5, we recommend omitting the proposed words "applied over exterior wall assemblies." These words are confusing and unnecessary. 2. Exterior wall coverings in accordance with section 504.5.2 applied over exterior wall assemblies.~~
- ◆ ~~The last sentence of Section 504.5 should also be deleted because it is confusing, not necessary, and will likely be misinterpreted. 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.~~
- At the end of Item 1 in Section 504.5.1, we recommend adding the words "rated from the exterior side" to clarify that the 1-hour fire-resistance-rated exterior wall assembly must be rated from the exterior side. 1. 1-hour fire-resistance-rated construction, rated from the exterior side.
- ◆ ~~The last sentence in Section 504.5.2 should be deleted because it conflicts with the charging language of 504.5, which requires compliance with either 504.5.1 or 504.5.2, but not necessarily both. Exterior wall coverings shall not reduce the fire performance of wall assemblies required by section 504.5.1.~~

Thank you for the opportunity to comment.

Sincerely,

Ken Pratt

Swanson Group
Plywood Technical Services Manager