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To: [Sujeski, Crystal@CALFIRE](mailto:Sujeski.Crystal@CALFIRE); CBSC@DGS
Subject: Public comment 45-day on SFM, Part 7, Sub-item 4-8
Date: Tuesday, April 28, 2026 12:27:06 PM
Attachments: [image001.png](#)
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To the California Building Standards Commission,

I appreciate the opportunity to provide comments on the proposed amendments to Section 504.5 (Exterior Walls) included in the 45-Day Express Terms in SUB-ITEM 4-8.

After review of the proposed language, I would like to respectfully identify several areas where additional clarification may be beneficial to ensure consistent interpretation and application.

Areas for Consideration

1. Clarity of Compliance Pathways

The current draft appears to present multiple approaches to compliance involving exterior wall construction and exterior wall coverings. In some instances, the language may be interpreted as requiring both, while in others it suggests that either approach may be sufficient. Additional clarification on the intended relationship between these provisions would help avoid differing interpretations.

2. Overlap Between Sections 504.5, 504.5.1, and 504.5.2

Certain provisions within Section 504.5 appear to overlap with or restate requirements found in Sections 504.5.1 and 504.5.2. This may create uncertainty regarding which provisions govern in specific applications. Clarifying the hierarchy and distinct roles of these sections could improve usability.

3. Consistency of Fire-Resistance Terminology

References to fire-resistance ratings, including whether ratings are determined from the exterior side, are not consistently stated throughout the section. Greater consistency in terminology would support clearer application during design and plan review in section 504.5.1 item#1.

4. Potential Redundancy with Existing Code Provisions

Some requirements, particularly those addressing the performance of exterior wall coverings relative to wall assemblies in section 504.5.2, may already be addressed in other sections of the California Building Code. Consideration may be given to whether cross-referencing existing provisions would reduce duplication and potential confusion.

5. Editorial and Formatting Clarity

There are minor editorial issues within the draft, including grammar, numbering, and

phrasing, that may benefit from refinement to improve readability and reduce ambiguity.

6. **Clarity of Flashing Requirements**

The language related to flashing installation could be interpreted in different ways regarding location and orientation. Additional clarification may help ensure consistent application in the field.

Closing

These comments are offered in the interest of supporting clear, consistent, and enforceable code language. Addressing the items above may help reduce ambiguity and improve implementation across design, construction, and enforcement.

Thank you for your consideration.

Sincerely,

Greg Andersen



Greg Andersen

Codes & Standards Engineer - Wildfire

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