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May 5, 2026

California Building Standards Commission
2525 Natomas Park Drive
Suite 130
Sacramento CA, 95833

Re: LP Building Solutions Comments on SFM 04/25 - 2025 California Wildland Urban Interface Code, Title 24, Part 7, Section 504.5 Exterior Walls (Sub-Item 4-8)

Dear Commissioners and Office of the State Fire Marshal staff:

LP Building Solutions (LP) appreciates the opportunity to submit comments on the proposed revisions to the California Wildland-Urban Interface Code. As a manufacturer of high-performance engineered wood products used in fire-resistant construction, LP strongly supports the Office of the State Fire Marshal's (SFM) efforts to reduce wildfire risk through science-based, effective building standards.

We offer the following recommendations to ensure that the proposed updates to Section 504.5 are clear, enforceable, and technically consistent. Our goal is to avoid ambiguity between mandatory code requirements and non-mandatory explanatory material, which can create uncertainty for manufacturers, design professionals, and Authorities Having Jurisdiction (AHJs) during plan review and field enforcement.

Recommended Amendments

- 1. Revise or remove the non-mandatory bracketed commentary preceding Section 504.5.**
Rationale: Although identified as non-mandatory, prefatory commentary is frequently reproduced in secondary guidance documents and inspection checklists. If this material appears to narrow or modify the adopted regulatory text, it can lead to inconsistent interpretations by plan reviewers and field inspectors. Removing or clarifying this commentary would help ensure that enforcement aligns with the adopted mandatory requirements.
- 2. Delete or substantially clarify the paragraph following Items 1 and 2 in Section 504.5.**
Rationale: As currently written, this paragraph can be interpreted as requiring both a compliant wall assembly *and* a specific wall covering. That reading conflicts with the intended "either/or" compliance framework set forth in Sections 504.5.1 and 504.5.2. Without clarification, this ambiguity risks disqualifying compliant, tested assemblies and



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undermining the code's performance-based approach.

3. **Align the Initial Statement of Reasons (ISOR) with the proposed code language.**

Rationale: The ISOR is a key reference for understanding regulatory intent, particularly when questions arise during permitting and inspection. The current ISOR discussion of Section 504.5 suggests cumulative requirements, rather than the alternative compliance pathways (Section 504.5.1 or 504.5.2) established in the code text. Aligning the ISOR with the adopted language would reduce confusion, limit disputes during project approvals, and improve consistent application statewide.

With these recommended changes, the language of Section 504.5 would read as follows (our recommended changes are identified in ~~strikethrough~~ / underline format):

SUB-ITEM 4-8

Section 504.5 Exterior walls

~~[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.]~~

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.~~

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

1. 1-hour fire-resistance-rated construction.
2. Ignition-resistant building materials in accordance with Section 503.2.
3. 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.
4. Log wall construction.
5. 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.
6. Wall assemblies tested in accordance with SFM-7A-1 and meeting the performance criteria for a 10-minute direct flame contact exposure test.



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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 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.~~

It is essential that all non-mandatory explanatory text—including bracketed commentary and the ISOR narrative—be fully aligned with the operative provisions of Section 504.5. Although the current draft indicates that compliance may be achieved through either Section 504.5.1 or Section 504.5.2, the conflicting explanatory language risks undermining this intended "either/or" framework.

Aligning the non-mandatory materials with the adopted code language will promote consistent statewide application by AHJs, reduce interpretive variability during plan review and inspection, and provide the building industry with the clarity needed to deploy innovative, fire-resistant exterior wall systems.

LP appreciates the Commission's consideration of these comments and remains available to discuss these recommendations further or to provide additional technical input in support of the rulemaking process.

Respectfully,

A handwritten signature in cursive script that reads "Chris Andrews".

Chris Andrews

Director, Fire Innovation

LP Building Solutions

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