



April 22nd, 2026

California Building Standards Commission
2525 Natomas Park Dr #130
Sacramento CA, 95833

California Building Standards Commission and Office of the State Fire Marshal,

Thank you for the opportunity for Arclin to make this public comment. We would like to make the following remarks on the California Wildland-Urban Interface Code:

Sub-Item 4-2

We support the moving of the language regarding paints, coatings, and stains into Section 503.2; however, we have a concern regarding the existing language. Since the movement opens the language for revision, it would be timely to fix it. Currently, it states that “Use of paints, coatings, stains, or other surface treatments are not an approved protection as required in this **chapter** [emphasis added].” By saying “chapter,” the provision prohibits the use of these products beyond the intent. The concern is that field-applied products may not have sufficient adhesion and durability in exterior applications, which is why having the language in Section 503.2 is appropriate. However, the term “chapter” extends the prohibition beyond that. For example, it would prohibit these products in fire-resistance-rated assemblies where they are not exposed to weathering. The problem is further amplified by Sub-Item 1-6, which would even prohibit these products from alternative means and methods.

We suggest that the language be changed to “Use of field-applied paints ... as required in this section ~~chapter~~.” This change will address the concern while keeping the intent of preventing these products from being used in exterior applications. It also clarifies that if part of a manufactured product, they will have the required quality assurance and appropriate testing to prove needed adhesion and durability.

Sub-Item 4-8

Arclin agrees with the intent of this change, but we worry that this proposal will cause more confusion. We hope that the following items will be clarified.

- Section 504.5. The paragraph that starts “Where exterior walls are constructed” is confusing. It implies that walls not constructed with ignition-resistant building materials are required to have a covering that complies with Section 504.5.2. It is also ambiguous with the term “constructed using ignition-resistant.” We assume that it means that the entire assembly is required to be ignition-resistant, but it does not state that.



- Section 504.5.2. The provision that requires wall covering to not reduce the fire performance is unclear. This is too broad and difficult to implement. Would every product have to prove that it does not reduce the fire performance? Would every product have to be included in E119 testing? Who would be responsible for all of this? Currently, it is left to the designer's judgement, which is reasonable and efficient. We prefer the language proposed by the Exterior Wall Subgroup led by Greg Anderson but still have concerns regarding the "shall not reduce the performance of assemblies" language. We recommend that this item be tabled for further discussion during the normal development cycle.

Arclin appreciates your consideration on these items and hope that this will aid in improving the code.

Thank you,

Loren Ross

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Code Compliance Engineer