



May 12, 2026

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

To the California Building Standards Commission,

Thank you for 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 reviewing the proposed language and engaging in discussion with industry peers, I respectfully offer the attached as recommended changes to Section 504.5 with justification.

The changes are marked by double-underline for additions and double-strikethrough for deletions. The changes provide necessary clarity, remove redundant language, and retain noncombustible construction as a recognized mode of exterior wall construction.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink that reads "Shamim Rashid-Sumar".

Shamim Rashid-Sumar, P.E., FSFPE  
Senior Vice President, Codes and Standards

Enclosure

## **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.~~

~~be constructed with one or more of the following methods, unless they are covered with an exterior wall covering complying with Section 504.5.2 and 504.5.2.1:~~

- ~~1. 1-hour fire-resistance-rated construction on the exterior side.~~
- ~~2. Noncombustible materials.~~
- ~~3. Heavy timber. Assembly of sawn lumber or glue-laminated wood with the smallest minimum nominal dimension of 4 inches (102 mm). Sawn or glue-laminated planks splined, tongue-and-groove or set close together and well spiked.~~
- ~~4. Log wall construction.~~
- ~~5. Wall assemblies that have been tested in accordance with the test procedures for a 10-minute direct flame contact exposure test set forth in ASTM E2707 with the conditions of acceptance shown in Section 504.9.3.~~
- ~~6. Wall assemblies that meet the performance criteria in accordance with the test procedures for a 10-minute direct flame contact exposure test set forth in SFM Standard 12-7A-1.~~
- ~~7. Wall assemblies suitable for exterior fire exposure containing one layer of 5/8-inch (15.9 mm) Type X gypsum sheathing applied behind the exterior wall covering or cladding on the exterior side of the framing.~~
- ~~8. Wall assemblies suitable for exterior fire exposure with a 1-hour fire-resistance rating, rated from the exterior side, as tested in accordance with ASTM E119 or UL 263.~~
- ~~9. Fire-retardant-treated wood labeled for exterior use and complying with Section 2303.2 of the California Building Code.~~

~~Such material shall extend from the top of the foundation to the underside of the roof sheathing~~

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

1. 1-hour fire-resistance-rated construction, rated from the exterior side.
2. ~~Ignition-resistant building materials in accordance with Section 503.2.~~  
Noncombustible construction.
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.

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 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.~~
1. Ignition-resistant building materials in accordance with Section 503.2.
2. 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.~~

~~**Exception:** Exterior wall coverings which are a component of an approved wall assembly complying with Section 504.5.~~

#### **504.5.2.1 Extent of exterior wall covering. ...**

...

**504.5.1 504.5.3 Flashing.** A minimum of 6 inches (152 mm) of metal flashing or noncombustible material applied vertically on the exterior of the wall shall be installed at

~~the ground, decking deck and roof intersections.~~ the base of an exterior wall at intersections between the ground, roofs, decks, and other horizontal components attached to the wall.

## **JUSTIFICATION**

The changes presented here clarify the intentions of Section 504.5 by removing conflicting language in this section of the regulations.

Section 504.5 is amended by deleting the bracket comment text and “applied over exterior wall assemblies.” This was a conflict with Section 504.5, which states that the exterior wall construction must comply with the construction requirements, or the exterior wall covering must comply. The designer can choose one or both paths for compliance.

Section 504.5 is further amended to remove the proposed text at the end of section, which was creating confusion and conflict with the statement of reason.

Section 504.5.1, item #1 was amended to add “rated from the exterior side” to provide additional clarity and to be consistent with language that was in the previous section 504.5 item #1.

Section 504.5.2 was amended to delete the section that states the covering cannot compromise the rating of the wall. This is already required in the CBC section 703.2.1.4.

Section 504.5.2 is amended editorially to correct grammar and provide clarity and a clear path to compliance, eliminating redundant language. A pointer to Section 503.2 is also provided.

Section 504.5.3 was amended to provide clarity that the flashing shall be applied at the base of the wall, vertically at the intersections.