

May 4th, 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

Dear California Building Standards Commission:

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

1. At the beginning of Sub-Item 4-8, we recommend striking the non-mandatory bracketed sentence inserted before the provisions of Section 504.5. 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.

2. 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 because, by definition, the exterior wall covering is part of the exterior wall assembly.

3. The last sentence of Section 504.5 should also be deleted because it is confusing, not necessary, and will likely be misinterpreted. As currently proposed, it appears to imply that exterior walls containing any ignition-resistant building materials (even if not necessarily constructed entirely of ignition-resistant building materials) do not need to comply with 504.5.2. It could also be interpreted that this means it does not need to comply with either of the preceding two options. This sentence is not needed because the language provided in the initial charging sentence of 504.5 and Items 1 and 2 clearly outline the allowable compliance paths.

4. Add the words “of the following” in the charging sentence of 504.5.1, as shown below.

5. 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. Furthermore, the term “fire performance,” as used in this proposed new sentence, is ambiguous and undefined. It is not clear how compliance with this proposed new sentence would be demonstrated.

With the recommended changes mentioned above, the language of Section 504.5 would read as follows (our recommended changes are identified in “red” as language to omit. Underlined comments represent language to remain):

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, rated from the exterior side.
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 gluelaminated 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 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.

(No additional recommended changes to the remainder of Section 504.5)

Thank you for your attention to this memo.

Sincerely,

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