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## CWUI WORK GROUP

### Meeting Minutes – September 17, 2025

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#### Work Group Representatives

##### Contacts:

Chair - Crystal Sujeski, OSFM-CDA-Div. Chief, (510) 846-1276, [Crystal.Sujeski@fire.ca.gov](mailto:Crystal.Sujeski@fire.ca.gov)

Co-Chair – John Morgan OSFM – CWPM Staff Chief, [John.Morgan@fire.ca.gov](mailto:John.Morgan@fire.ca.gov)

Co-Chair – Mitchel Baker (HCD representative), [mitchel.baker@hcd.ca.gov](mailto:mitchel.baker@hcd.ca.gov)

Support – Jena Garcia, OSFM-CDA-Supervisor, 916-531-7650, [Jena.Garcia@fire.ca.gov](mailto:Jena.Garcia@fire.ca.gov)

#### I. CALL TO ORDER: Sujeski called the meeting to order at 1:03 PM

Sujeski

- A. Welcome
- B. Introductions - Roster update based on attendance log of all participated.
  - 1. No roll call due to time restraint.
  - 2. Introductions- Requested to use Chat feature for introductions if you are new.
- C. Agenda Review –
  - 1. Agenda is posted in the committee section of the OSFM website with Minutes.
  - 2. Reviewed how to access and subscribe for OSFM Work Group notifications and emails: [Workgroups | OSFM](#) & [Subscribe to Newsletter | OSFM](#)

<b>Motion:</b> No objections <b>Action:</b> Approved
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#### II. OLD BUSINESS

- A. Charter – Status update. Still in Executive review
- B. Proposals – Drafted proposal need to be emailed to contacts provided above to be agendized and added to the minutes.
- C. Slate Bryer – Vent Performance (10-15 Presentation) – Reviewed in sub-group. It still needs work. Will be presented on a later date.
- D. Steve Hawks – Burn Video presentation (Status Update-Proposed for Oct/Nov)
- E. Chris Fano – Governor’s Office of Land Use and Climate Innovations – Presentation on earthen building materials. With Justine Massey – (Licensed Attorney) Advisor to the Executive Director at the Strategic Growth Council.
  - 1. Summary: Seven natural building materials are discussed, with a focus on Adobe, Hempcrete, Lime Plaster, Straw Bale, and Light Straw Clay, which are already included as voluntary appendices in the International Residential Code (IRC). Of these, only Straw Bale has been approved by California's HCD for statewide use. The goal is to move all four materials into the mandatory sections of the code and potentially expand their adoption under the California Building Code (CBC) to support a wider range of residential projects. (See link below for recorded presentation)
  - 2. Group Discussion:
    - a. Mathew Sunup – Has there been a seismic study?
      - i. Anthony Dente (VSE) – Yes.
      - ii. Martin Hammer – Provided information on reinforcement methods.
    - b. Milad Shabanian – Was the test wall assembly specific?

- i. Anthony Dente (VSE) Hempcrete, light straw clay, and most straw bale construction are mainly used for insulation, though straw bale can be load-bearing with reinforced plaster, while monolithic adobe is a reinforced, concrete-like material used for structural walls.
- ii. Chris Fano - It doesn't list the the structure directly, but as ANSI mentioned, the monolithic Adobe was a 10 inch thick wall that was tested for this ASTM E119 test.
- iii. Martin Hammer – 3 tests were conducted on hemp-lime assemblies using one of the four framing options outlined in Appendix BL, focusing on the most common configurations: center stud, exterior stud, and interior stud.
- c. Greg Anderson – Do see an issue with listing materials with SFM provided it meets any one of the test specified in the code.
- d. Marcelo Hirschler- Does not see relevance for this specific work group.
  - i. Crystal Sujeski – Agendized – it was identified as a subject important to the governor's office this time for this committee to consider.
- e. Kevin Scott – Some of these options may be acceptable exterior wall and they should be considered to be listed. Should be listed in the residential code but code be added to CWUI.
  - i. Chris Fano – That is similar to the interest that Chief Bigelow has expressed.

### III. NEW BUSINESS

Sujeski

A. Sub-Groups – Final Draft Report will be posted separately.

1. **AB 2322 CWUI Chapter 5 ASCE 7 Sub-Group** – Paul Armstrong [parmstrong@awc.org](mailto:parmstrong@awc.org) and Sunup Mathew [smathew@imiweb.org](mailto:smathew@imiweb.org) (reported)
  - a. Met 9/15/25
  - b. 2025 Part 7 CWUIC– Rough Draft Proposal (Poll -
    - a) Proposed to be located in Chapter 5
      - a) Refinement of critical infrastructure list proposed in New Section 504.12 New Non-residential, critical infrastructure buildings. Upon further study made the following revisions.
        - a) Delete item 1 – These type of facilities would most likely not be considered for emergency shelters.
        - b) Delete items 8
        - c) Table of requirements
        - d) Penetration/Opening protection provisions
        - e) Exclusion of private airstrips
        - f) Focus on fire resistance and building envelope
        - g) Challenges with self closing assemblies such as doors, skylights, vents.
      - b) Other construction material groups are expressing interest in this subgroup.
    - b) Mathew Sunup – When is the deadline to get the proposals in?
      - a) Crystal Sujeski – All proposals are due by October 1<sup>st</sup>.
    - c) Mathew Sunup – Presented the drafted cost study
      - a) Crystal Sujeski – Ensure justification is provided for each individual occupancy listed.
      - b) Group Discussion –

- a) Daniel Deloach – Commented that the cost analysis needs to include the primary and secondary member protection.
  - c. Work Group Poll – Consensus “Needs Further Study”
    - Opposed/Disagree- 1
    - Needs further study – 30
    - Agree – 11
  - d. Crystal Sujeski – Based on the Work Group poll results this will not be considered in the intervening. Recommend further study and work on preparing the proposal for the triennial.
2. **Scope** - Robert Raymer [r-raymer@cbia.org](mailto:r-raymer@cbia.org)
- a. No report. Draft has been attached to the previous meeting minutes. This will be reviewed during the October meeting.
3. **Roofing** – [Helene Hardy Pierce](#)
- a. Section 504.2 was revised for consistency in terminology related to roof assemblies tested per ASTM E108 or UL790, and exceptions were updated to align more closely with the California Building Code. A major overhaul of Section 504.2.1 clarified requirements for roof coverings with air spaces to protect decks and prevent ember intrusion, including fire-blocking measures at eaves, ridges, and hips. Additional revisions updated roof valley flashing standards to align with international codes and allowed alternative materials, with final tweaks ensuring consistent use of classification terms across related sections.
  - b. Group Discussion:
    - i. Marcelo Hirschler – Mineral wool board concern.
      - a) Helene Hardy Pierce – Will bring the concern to the subgroups' next meeting.
      - b) Kevin Scott – Recommended to just modify the one item by saying “non-combustible mineral wool board”.
    - ii. Kevin Scott – Section 504.2.2 item 2 – revise to say maximum 26 gauge cause that’s the minimum.
  - c. Work Group Poll – Consensus “Agree”
    - Opposed/Disagree- 0
    - Needs further study – 1
    - Agree – 24
  - d. Crystal Sujeski – Based on the Work Group poll results, this will be considered in the intervening. Recommend that the subgroup finalize the proposal for the next meeting.
4. **Accessory Buildings** – Milad Shabanian [Milad.Shabanian@stantec.com](mailto:Milad.Shabanian@stantec.com)
- a. Update focused on aligning accessory structure regulations within the California Wildland-Urban Interface code, particularly revising Chapter 5 and related sections. Key changes include reducing the required setback distance from lot lines from 50 to 30 feet based on studies, and matching accessory structures larger than 120 square feet with building requirements, including ignition resistance and Class A construction standards. For smaller structures under 120 square feet, the code allows local officials to require ignition-resistant, noncombustible materials. Overall, the group aimed to clarify and simplify language while ensuring consistent safety standards for accessory buildings.

- b. Group Discussion:
  - i. Kevin Scott – Section 101.3.1 Application proposal needs to be addressed in the Scope Sub-group with Robert Raymer. This proposal conflicts with the Scope sub-group work.
    - a) Crystal Sujeski – This portion of the proposal will be separated and excluded.
  - ii. Crystal Sujeski – Clean up underline and strikeout.
- c. Work Group Poll – Consensus “Agree”
  - Opposed/Disagree- 0
  - Needs further study – 2
  - Agree - 18

**5. Weathering / Ignition-Resistant Materials** – Marcelo Hirschler [mmh@gbhint.com](mailto:mmh@gbhint.com)

- a. Revisions reorganize sections on ignition-resistant building materials to improve clarity, relocating definitions and provisions without altering existing requirements. Fire-retardant treated wood roofing is placed in its own section, and language prohibiting paint coatings in certain areas is clarified and repositioned. The key technical update extends weathering requirements to all fire-retardant materials—not just fire-retardant treated wood—ensuring all such materials meet weathering performance standards. Although specific test procedures for some materials are not yet defined, manufacturers must demonstrate that fire performance is retained after weathering. Overall, these changes enhance code structure while maintaining consistency with prior agreements.
- b. Group Discussion:
  - i. Michael Beaton – (Intertek) Weathering requirements are nearly unenforceable with regard to acceptable methods.
  - ii. Kevin Scott – Issues with the “weathering test section and inquired as to where is Section 503.3.
    - a) Marcelo Hirschler – Section 503.3 was relocated due to renumbering. All ignitions resistant building materials is considered.
  - iii. Todd Stratmoen - Asked about wood composite decking and plastic lumber weathering requirements in the international WUI code. He pointed out that while the code references weathering in accordance with ASTM D7032 and ASTM D6662, it doesn't specify which exact weathering procedure to follow within those standards, which include multiple options. He asked if there has been any consideration to clarify which specific weathering procedure should be used for these materials.
    - a) Marcelo Hirschler - explained that he chairs the committee responsible for the plastic lumber standard ASTM D2020 and D6662. He clarified that the weathering language in ASTM D6662 and D7032 has been included in the code for several cycles and is not new. Specifically, if plastic lumber lacks cellulosic material, it doesn't require certain tests, and the standards specify the necessary UV, temperature, and moisture testing. Overall, the existing code language on this topic has been stable and unchanged for at least two code cycles.
  - iv. Jason Smart – Conveyed that the subgroup did not agree to the new sentence being added to Section 503.2.3.3

- a) Marcelo Hirschler – Agreed. Needs further study to add new language to section 503.2.3.3
  - v. Eric Driever – “The proposed language at 503.2.3.3 - Weathering, is not enforceable. Creation of testing standards for weathering would need to take into account an extreme range of climactic conditions. California climates range from extreme heat to extreme cold, dry to wet, and coastal. It is not clear how agencies will insure that industries are considering all appropriate weathering tests. As the proposer stated, expecting this subgroup to predetermine the specific weathering standards is not appropriate. Similarly without testing lab or testing organization collaboration it seems unlikely that appropriate testing standards are possible without significant additional study.”
  - c. Work Group Poll – Consensus “Needs further study”
    - Opposed/Disagree- 1
    - Needs further study – 22
    - Agree – 5
- 6. **Vents-** Kevin Scott [khscottassoc@gmail.com](mailto:khscottassoc@gmail.com)
  - a. Two proposals: the first clarifies which vents need protection from ember intrusion, specifying that vents leading to unoccupied spaces like garages or mechanical rooms are covered, while dryer, kitchen, and bathroom vents that go directly into equipment are excluded. The second proposal deals with testing vents for ember resistance, addressing the current standard that requires testing vents either vertically or horizontally (ASTM E2886), but not on slopes. There’s debate on whether vents should be tested in both positions because wind-driven embers can approach vents differently, but there’s no clear evidence that current testing is inadequate, so the committee needs to decide if both orientations should be required.
  - b. Group Discussion: 1<sup>st</sup> Proposal – Drafted proposal attached –
    - i. Marcelo Hirschler – California we’ve been using the ASTM standard by testing a section of the vent in the specimen holder—even for vents larger than the standard size—and most vents tend to be uniform regardless of their overall size, why can’t we continue using this approach for testing?
      - a) Kevin Scott - The issue is that some testing facilities refuse to test vents that are smaller than the ones normally manufactured or sold, especially if the small size is only for fitting into the test apparatus. If the vent size doesn’t represent what is typically sold, they won’t perform the test.
    - ii. Slate Bryer – Option 1 & 2 issues.
      - a) Raised a concern about options one and two, noting that ASTM is currently considering an open ballot to update standard E2886 to require testing in both directions. If we adopt option two, which allows testing in either direction, and the ASTM change passes in December, it would create a conflict between the building code and the updated test standard.
      - b) Shared that during recent testing of a listed vent product installed vertically, the product passed when there was no wind but failed when a 6-mile-per-hour wind was applied. This test highlights important considerations that still need further discussion. He plans to present the full test results at the next meeting.
  - c. Work Group Poll 1<sup>st</sup> Proposal– Consensus “Agree”

Opposed/Disagree- 0  
Needs further study – 5  
Agree - 16

- d. Group Discussion: 2nd Proposal – Drafted proposal attached –
- i. Larry Williams – This isn't ready right now but its bringing it to the forefront.
  - ii. Marcelo Hirschler – Disagrees. Emphasizing that materials without existing weathering test standards do change over time and manufacturers should be responsible for developing appropriate tests rather than the code bodies mandating test creation. He supports Kevin's proposal and hopes to quickly present the revised language they developed.
  - iii. Kevin Reinerston – The group has spent a significant amount of time—about half of all their meetings—discussing the vent provisions. He invited anyone with relevant information to share it with the group so they can work toward resolving the issue.
  - iv. Kelly Berkompas - Agreed that a weathering test option for vents is needed but feels there isn't enough time to implement it right now. She emphasized that while the issue is important and must be addressed, the group shouldn't ignore the problem—comparing it to the need for testing vents in both vertical and horizontal positions to ensure proper protection.
  - v. Michael Beaton – suggested that if there isn't a testing procedure for a specific material, like intumescent coating, it might be best to temporarily exclude it from the current code section. He recommended using the ICC Evaluation Service's existing process for developing standards for alternative materials, allowing manufacturers to create standards that could eventually be incorporated back into the code. This approach ensures the code remains enforceable while providing a clear path for new materials.
    - a) Kevin Scott - Are are you suggesting that something goes in the code right now and just refers to AES report?
    - b) Michael Beaton – No, just suggest basically exclude.
    - c) Marcelo Hirschler - One way of solving this is to do the same test that will do for wood ASTM D 2898, and then if someone says I've got a better one, well, let's let's use that better one.
    - d) Slate Bryer - Acknowledged Marcelo's point but explained that applying the referenced standard would require completely modifying the test apparatus, which currently lacks defined parameters. He agreed it could be a viable path forward, but emphasized that it will require significant effort.
- e. Work Group Poll 2<sup>nd</sup> Proposal– Consensus “Needs further study”  
Opposed/Disagree- 1  
Needs further study – 16  
Agree - 4

7. **Chapter 6** – Larry Williams [larry.williams@ventura.org](mailto:larry.williams@ventura.org)

- a. Provided an updated and cleaned-up version of the proposed changes for Chapter 6, reflecting input from recent meetings, including one with LA County Fire. Most of the proposed edits are minor and editorial in nature, such as clarifying that Chapter 6 requirements don't apply to map adoption and recommending the addition of a definition for "vegetation" from the government code. Additional changes include emphasizing full disclosure of existing and proposed vegetation in Fire Protection Plans, acknowledging the need for future



revisions related to Zone 0, and cleaning up language around tree spacing and vegetation management (e.g., removing the subjective term "hazardous"). Lastly, the group proposed referencing the complete government code in Section 612 to clearly inform users of required findings.

- b. Group Discussion:
  - i. Milad Shabanian – Suggested that future work should consider adding provisions for non-combustible fencing and mulch within five feet of structures, aligning with proposals approved for the 2027 IWUIC edition.
    - a) Larry Williams - It's likely too late to include them in the current cycle; however, he mentioned local jurisdictions like Ventura County can adopt such measures, and expects the upcoming Board of Forestry Zone 0 regulations and guidance document to address them within the year.
  - ii. Kevin Scott- Can we change the language that's duplicated from another document?
    - a) Crystal Sujeski - Broadly the approach is to make more specific unless the law is more specific.
- c. Work Group Poll (excluding item 6-12 from the proposal)– Consensus "Agree"  
Opposed/Disagree- 0  
Needs further study – 0  
Agree - 13

#### 8. **Windows** – [Daniel Gorham](#)

- a. Provided an update on the Windows subgroup's recent meeting, where consensus was reached to change the requirement so that only the inner pane of exterior windows needs to be tempered glass, rather than both panes. This change is based on research showing tempered glass offers better fire resistance, with little expected cost impact. The group also discussed the challenges of applying this requirement to skylights, which typically have tempered outer panes for safety, leading to a new compliance option specifically for multilayered skylights. Jennifer Hatfield from the fenestration industry supported this approach, noting the importance of separating skylights due to safety codes and that the original study did not include them; she also mentioned ongoing efforts to fine-tune the language. Overall, the subgroup aims to focus on practical steps now while considering further refinements in future cycles.
- b. Group Discussion:
  - i. No Questions/Comments.
- c. Work Group Poll – Consensus "Agree"  
Opposed/Disagree- 0  
Needs further study – 2  
Agree - 22

#### 9. **LRA Moderate Discussion** – John Morgan/Crystal Sujeski

- a. John Morgan – When the State Fire Marshal was required to rezone, the zones extended down to the "moderate" category, with urban cores considered "unsound" and risk levels increasing toward city outskirts. He noted that although zones include moderate areas, many regulations don't necessarily apply in Local Responsibility Area (LRA) moderate zones and must be considered on a case-by-case basis.

- b. Crystal Sujeski - Explained that Health and Safety Code 13108.5 requires the State Fire Marshal to expand building regulations to Local Responsibility Areas (LRA) designated as "very high" and "high" fire severity zones, effective January 1 with the 2025 Part 7 WUI code. The law also calls for considering expansion of similar provisions to "moderate" zones within State Responsibility Areas (SRA). Should LRA moderate requirements be considered in future work group efforts?
- c. Group Discussion:
  - i. Kevin Reinertson – In support for advancing updated wildfire building regulations, emphasizing that during the original development of 7A, they lacked the ability to include moderate or high fire zones, which was a significant challenge. He highlighted that many major structure loss fires over the past decades have occurred in these zones, reinforcing the need for action. He urged the group to vote in favor of moving the proposal forward.
  - ii. Darcy Davidson- In support for defensible space and ignition-resistant construction but recommended that decisions to expand regulations into moderate fire zones be left to local jurisdictions. She noted that the new moderate fire maps are still being evaluated and that local agencies may have more accurate, up-to-date data to guide decisions. Some areas mapped as moderate may not warrant stricter regulations, while others not yet mapped might. Therefore, she advocated for local control based on specific community assessments.
  - iii. Greg Andersen - Added that many of the largest fire losses have occurred in moderate zones and noted that the committee had previously voted to include moderate areas. However, implementation was delayed due to the lack of mapping at the time. Now that mapping exists, he supports extending regulations to include moderate zones.
  - iv. Kevin Scott - Argued that fire and ember spread often extends beyond mapped zones, including areas not even classified as moderate. Citing after-action reports and significant structure losses, he emphasized that fire doesn't follow map boundaries and believes there is now enough data and experience to justify expanding regulations.
- d. Work Group Poll – Consensus “Agree”
  - Opposed/Disagree- 0
  - Needs further study – 1
  - Agree - 13

#### IV. ROUNDTABLE

**Sujeski**

- A. Exterior Walls - Greg Anderson (IBHS) – Proposal modifies 504.5 Exterior walls item #7 to be excluded and raised concerns with allowing non-ignition resistant siding over exterior surfaces may create voids and vulnerable areas for direct flame or ember intrusion.
  - 1. Kevin Scott – Supports glazing portion, but proposes some revisions.
  - 2. Marcelo Hirschler – Further added revisions that simplify Kevin Scotts proposal. And encourages deleting items 5 & 6.
- B. Window Frames - Greg Anderson (IBHS) – Proposal adds 504.8.1 Window frames to provides constructability provisions.
  - 1. Marcelo Hirschler – Supports
- C. Eaves and Soffits - Milad Shabanian Proposal provides provisions for separations distances or constructability of surfaces that have exposure to flame and embers.



V. PUBLIC COMMENT  
None

Sujeski

VI. UPCOMING MEETING DATE FOR 2025

Sujeski

A. Meetings will be held the **first Wednesday of each month at 1:00 pm** and will remain virtual

i. Next Meeting –October 1, 2025

7. MEETING ADJOURNED (Motion Required) 6:00 PM

Sujeski

Motion:	No objections.
Action:	Approved

If you would like to watch the recording of this meeting, please visit the link below:

Pt 1:

<https://youtu.be/gSPNLKBAEfQ>

Pt 2:

[https://youtu.be/SFy\\_xaIG1rs](https://youtu.be/SFy_xaIG1rs)