CWUI WORK GROUP
Meeting Minutes – May 11, 2026
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I. CALL TO ORDER AT 1:34 PM

A. Welcome/Introductions – Crystal Sujeski
   1. Leaders of the Sub-Groups introduce themselves to the committee with updates on their subgroups. These updates have been added under the associated subgroup below.

B. Agenda/Minutes Review – April 1, 2026 Minutes
   1. Crystal Sujeski goes over how to find these minutes on the website (go to the Code Development and Analysis Work Groups website page for all agendas and minutes), how to subscribe to the OSFM Committee and Workgroup updates and the Title 24 email lists to receive agendas and other updates through email, and to use the YouTube link on every minutes to watch the full recording of the meeting.
   2. Current rulemaking packages for the 2025 Intervening code cycle can be found on the Building Standard Commission website, including comments received during the 45-Day public comment period.
   3. Part 7 will have a 15-Day comment period due to public comments regarding the exterior wall covering section, the Express terms of which are being worked on with the help of the exterior wall subgroup:
      i. The changes are attempting to clarify the application of the provisions and not make any major technical changes.
      ii. There is also a revision to the flashing criteria that is intended to clarify the application of the provisions.
      iii. Noncombustible materials were added back after being stricken out, even though these materials may be captured in ignition resistant materials, Shamim Rashid-Sumar and Milad Shabanian felt it was important to highlight the availability of noncombustible materials.
      iv. Shamim Rashid-Sumar explains that noncombustible materials was stricken out and replaced by ignition resistant building materials, and while ignition resistant building materials capture noncombustible materials, not all ignition resistant building materials are noncombustible. It felt important to make clear that noncombustible materials are an option.
      v. Marcelo Hirschler is opposed to adding noncombustible materials, not because they aren't an appropriate method of construction, but rather because Section 503.2 has all the information about ignition resistant building materials, including noncombustible materials. Another type of material that

has always been there is fire retardant treated wood materials, and there were lots of debates about why that was taken out of the list and it was because it was within ignition resistant building materials. Marcelo Hirschler is worried that if different types of ignition resistant building materials are added back in, then all of them would be and it would have the same problems as before. In Section 503.2, ignition resistant building materials include noncombustible materials, so there is no need to add it.

vi. Milad Shabanian states that fire retardant treated wood was previously addressed as a material required for the exterior, so it was addressed in item number 9 and there is an exterior wall covering section below 504.5.1 where fire retardant treated wood was always allowed as an exterior covering, not as construction material. Looking back at the previous language, the original language, noncombustible construction is what is in the IWUI code and was previously in the CWUI code as a construction material, meaning a whole wall can be built with noncombustible material. If this is changed to ignition resistant materials, this will allow for different thicknesses of fire-retardant treated wood instead of noncombustible materials which might not provide the same level of protection. That is the difference between construction and siding. Section 504.5.1 is only referring to construction types.

vii. Marco Mack was looking at combustible versus noncombustible and concluded that it's very misleading. He found multiple definitions but still came back to the conclusion that it's part of types of construction and it's part of the nomenclature. This is one of the things he is hoping to work on with the retrofit sub-group, moving away from layman type terminology and looking at ignitable things that are not ignitable. So, the work group could create a definition if there is a concern about combustible versus noncombustible. However, in this case there's a type of construction that's noncombustible and everyone accepts it, then it's reasonable to be in this location.

viii. Shamim Rashid-Sumar responds to Marcelo Hirschler's comments, stating that noncombustible materials are really a different class of materials. They are not the same to be lumped in with the other ignition resistant building materials that are clearly a part of that group. Shamim Rashid-Sumar objects to lumping noncombustible materials into ignition resistant materials.

ix. Marcelo Hirschler states that if you look at both 504.5.1 and 504.5.2, both cases have ignition resistant building materials and noncombustible materials. In both cases they are just simply showing without any information on size and thickness. There is a significant difference between 504.5.1 and 504.5.2. 504.5.2 is the exterior wall covering that is part of the entire exterior wall assembly which is the outside layer, and the outside layer is for any ignition resistant building material for outside use. In 504.5.1, it is saying the entire structure can be constructed of either noncombustible materials or other ignition resistant materials. So yes, if the work group thinks that the entire assembly should not be constructed of other ignition resistant materials, then cut that out of there. But that's not what is currently happening. Looking at 504.5.1, some of the other items in there like log wall construction or wall assemblies tested in accordance with ASTM E2707 have a lower performance. 504.5.1 is the entire exterior wall assembly and 504.5.2 is the

exterior layer, and in both cases, there is nothing said about the thickness. They both simply refer to 503.2, which is the correct thing.

x. Kevin Scott says that in his mind this conversation is about two locations. Either it's a part of the wall construction or it's the exterior covering. As a part of the wall construction, the code does have noncombustible construction. It should be retained as shown in 504.5.1, because it's noncombustible construction. Versus, what someone is covering the exterior wall with noncombustible materials 504.5.2, it should not be in that section. That's the section where the code refers them to ignition resistance and they are sent to section 503.2. Kevin Scott is questioning why these two sections are written differently. 504.5.1 item number three, ignition resistant building materials in accordance with 503.2. For wall covering, 504.5.2 item number 2 the ignition resistant building materials labeled for exterior use. Why is there a reference to section 503.2 in one but not the other? The code either needs this reference, or it doesn't. When there are sections like this it creates confusion on how it is applied. When looking at 503.2, noncombustible materials are included there for the exterior wall covering, not noncombustible construction. That's not there, so it should be in 504.5.1, not 504.5.2.

xi. Chris Andrews says that if you put noncombustible back in, to Marcelo's point, there were a couple of other assemblies that were called out, like FRT and gypsum. Those were more material based and with removing noncombustible from the 5.1 section, the code would be leaning more into an actual performance with items that are all test based, like E2707 or the CAL FIRE version of that. So, if that comes back in, the code will need to have some of these others.

xii. Karen Martinez says that she lost her house in the Palisades fire and has been helping her neighbors rebuild. She is building using completely noncombustible materials and thinks it is really important that the code puts noncombustible in as many places as possible as many homeowners don't know that they can build with noncombustible materials.

xiii. Marcelo Hirschler says that Kevin Scott put it well, looking at 504.5.1 instead of calling it noncombustible materials since this is the entire wall construction, you say noncombustible construction because it's not the materials. Item 3 in 504.5.1 should be exactly the same as item 2 in 504.5.2. In 504.5.2, noncombustible material is unnecessary because it's just a part of ignition resistant building materials. It is one of the ignition resistant building materials, in accordance with 503.2. Marcelo Hirschler agrees with what Kevin Scott said in regard to 504.5.1 and combustible construction versus materials.

xiv. Shamim Rashid-Sumar responds to the comment about ignition resistant building materials being based on a test, pointing out that noncombustible materials are also based on testing, they are based on ASTME 136.

xv. Milad Shabanian agrees with Kevin Scott, but on page two, section 504.5.1, item number 3: ignition resistant building materials in accordance with 503.2 is a new item which is going to make a kind of replication. Item 1 should be replaced with noncombustible construction. Milad Shabanian recommends eliminating item number three from this section and the next section 504.5.2. The first three items can be removed and replaced with ignition resistant

building materials in accordance with section 503.2, which is going to make this very clear and clean.

xvi. Crystal Sujeski thanks everyone for the discussion and recommends that the exterior wall group meets again to continue the discussion. If the group can come to a consensus that does not substantially change the material then this will be a part of the 15-day public comment period, if not the change will have to be withdrawn and can become a suggestion for the triennial code cycle.

4. For each subgroup leader, please include a Code Development Staff member on the invite list.

II. OLD BUSINESS

A. PCH Recap

1. OSFM did have several proposals that were heard at the public comment hearings in Connecticut to try and align CWUI with IWUI. Some proposals were unsuccessful, but not all and there did appear to be interest that will help elevate the proposals for the next cycle.
2. Milad Shabanian highlights some changes that happened to defensible space requirements. There is a difference between California's zoning requirements in part 7 (CWUI) and what is in the IWUI, and those changes need to be reflected in the next cycle of changes, because there are some sections relying on zoning requirements and it's going to be better to have those in the WUI code.
3. Marcelo Hirschler states that this IWUI cycle had the most proposals ever, at 73 proposals and that the committee and membership did a magnificent job of cleaning up a lot of things. This includes cleaning up the issue of different classes. There are still 3 classes, but they are no longer identified with small type of hazard, they are now just three different classes. Everything that has to do with ignition resistant building materials are all together. Information on noncombustible materials is cleaned up. The work on noncombustible materials is now consistent with one another, as Shamim said, they all say that you need to test in accordance with ASTME 136 instead of saying 'under the conditions anticipated'. There is a list of those materials that there's no point in testing. He agrees with Milad that the work group needs to look at defensible space. Marcelo Hirschler adds that the next thing to look at is what used to be called Class 3, because there are virtually no requirements right now and that needs to be cleaned up a little bit.
4. Paul Armstrong mentions that in the next cycle, ICC will have its own committee for the IWUI code, so it will be different because comments will be made to people who are much more adept and well versed in wildland fire. Not that the Fire Code Committee wasn't necessarily not adept, but there was a broad level of experience and background because the committee had to cover everything in the Fire Code. So, the next cycle that will result in the 2030 edition of the codes will be even more focused on wildland and create an even better model code for the California codes to be based on.
5. Crystal Sujeski adds that the tiered system that Marcelo talked about has been a discussion in the CWUI work group. The emergency regulations did expand the regulations for construction into the local responsibility area high severity zones, whereas it was previously only required in the identified very high severity zones. There is a plan to do an information bulletin at some point outlining the scope and applicability. The work group still needs to work on what to do in the moderate

severity zones. Every five years, the maps get redrawn and evaluated as there may be other areas that get developed and all off or that get identified as a lower hazard, so the risk is what the insurance companies are looking at. It's this fine balance of hazard versus risk and it's on the Office of the State Fire Marshal website. Crystal Sujeski would like the group to think about forming a subgroup that would deal with the identified local responsibility area moderate severity zones.

III. NEW BUSINESS

A. Sub-Groups

1. AB 2322 CH7A ASCE 7 Sub-Group – Paul Armstrong and Sunup Mathew
    i. Haven't met, nothing to report
    ii. Sunup Matthew says that meetings will likely start in May, and asks for confirmation if this would be the right time to start for the next cycle
    iii. Crystal Sujeski states that this issue is being discussed by other state agencies as it doesn't just affect homes and recommends working with FCAC working group 7 if there are proposals that this subgroup wants to move forward for either the triennial code cycle or the next ICC code cycle.
    iv. Sunup Matthew asks if the legislation that is the basis of this subgroup will be applicable to ICC jurisdiction.
    v. Crystal Sujeski answers that as a state agency, OSFM has met the obligation outlined by the legislation, however that does not stop the subgroup from continuing the conversation at the international level. If members wish to continue to work towards consensus in the workgroup they can, but there's not anything more at this point that can be moved forward at the state level.
    vi. Kevin Scott asks if Crystal Sujeski is suggesting taking the intended language from the legislature and submitting it to the ICC. Crystal Sujeski says that is not her recommendation, Kevin Scott agrees. It was difficult enough even talking about one class of construction and the legislature wants us to have four-hour construction in the very high hazard area. But if it's one hour construction or two-hour construction, that might be doable.
    vii. Shamim Rashid-Sumar offers a different perspective, although he appreciates the comment that the subgroup was not necessarily able to reach consensus in this cycle. The legislative language is missing a lot of those complex issues that have to be worked through. It's not just exterior wall construction, but it was really tapping into building envelope issues, doors and windows, and just listening to the discussion that was previous to this from the windows and doors group. There's a lot of work that needs to be done to really shape this proposal into something meaningful for the California code. Shamim Rashid-Sumar proposes not giving up on this subgroup just yet and look into some of those issues. It may just need additional research, although he does agree with having these discussions at the international or national level. Spending a bit more time on the subgroup to explore some of those issues that weren't fleshed out would not be a waste of time as there are people who are still passionate about it.
    viii. The work will continue with the additional support of Shamim Rashid-Sumar.
2. Scope – Robert Raymer
    i. No updates

3. Roofing – Helene Hardy Pierce
    i. No updates
4. Accessory Buildings – Milad Shabanian
    i. No updates
5. Weathering / Ignition-Resistant Materials – Marcelo Hirschler
    i. Will be meeting June 18, not expecting much change.
6. Vents- Kevin Scott
    i. Haven't met since the submittal by the State Fire Marshal, currently in a holding pattern.
7. Chapters 2/6 – Larry Williams
    i. Haven't met yet
    ii. Larry Williams asks if there is an update about the information bulletin on the CWUI code, Crystal Sujeski answers that it's still in review.
8. Chapter 4 – Matthew Mckenna and Larry Williams
    i. Haven't met yet
9. Windows/Doors – Daniel Gorham and Greg Andersen
    i. Meets the third of every month, if you would like to participate, send an email to Daniel Gorham and Greg Andersen
    ii. Crystal Sujeski states that in this cycle, this subgroup dealt with the glazing through the tests from different testing labs, as well as tempering.
    iii. Jennifer Hatfield adds that the subgroup is working on getting testing done in the near future.
    iv. Kathy Krafka Harkema says that the fenestration and glazing industry is working with the windows and doors subgroup and the subgroup has identified some additional research that is needed to help back up some of the beliefs about possible recommendations. It's important to get sound data behind things as well as test methods. For two panes of glass, typically the industry had believed that it was the exterior pane that should be tempered. In the California coded, one pane is required to be tempered, and now the research is showing that it's better to have the interior pane closest to the home tempered if only one pane is tempered.
    v. Kevin Scott adds that IBHS has a document with a checklist of criteria of what someone needs to do to get a discount with the insurance companies. With regard to windows, the interface code and the California code pretty much match their guidelines, except insurance requires both windows to be tempered. So, you comply with the code and think you are going to get a good insurance break, and you don't qualify because you didn't put the right windows in. If there's research showing that having two tempered windows is not significantly better than having one, the subgroup should work on convincing IBHS to change their criteria. If the research shows that having two tempered panes is significantly better than having one, then the subgroup should look into changing the code. The code requirements and insurance requirements should have the same minimum requirements to match compliance.
    vi. Grant Muller representing FGIA mentions conversations he has had with Daniel Gorham about two lighted tempered versus one lighted tempered.

There's a physical reason that there is a difference and the most recent testing that UL did proved that the brake pattern of the glass is significant. Looking at the makeup of an uninsulated glass unit with one lighted glass, it tends to break in long shards and bigger pieces and for as long as that stays in place, it acts as a buffer to the tempered glass. The benefit to tempered glass is that it is basically four times more resistant to thermal stress shock than annealed glass, so it takes longer with heat exposure to break. But, when it breaks, it breaks catastrophically and into very small pieces. Nine times out of ten, it'll just blow right out of the opening with any pressure at all. There's been discussions about other thermally strengthened glass, one of which is heat strengthened glass which is halfway between annealed and fully tempered glass. This enhances the thermal stress capability or handing capability of the glass, so when it breaks, it breaks more like annealed glass. Kathy Krafka Harkema adds that this is one of the items that will be worked on with the additional research that the subgroup is doing.

vii. Crystal Sujeski states that this subgroup has also being working with the California Energy Commission, as windows have crossover with energy efficiency.

viii. Marcelo Hirschler asks if the subgroup has discussed potentially limiting the materials that can be used for window frames.

ix. Grant Muller says there has been a discussion about framing material and the style of windows. There's a reason certain framing materials have been used in the industry because they are thermally far more efficient than others. Steel is less efficient than wood. Vinyl is very efficient and it's a thermal plastic, so there are some issues that come up with exposure to fires. These are other things that will be included in future testing, to design windows that are more likely to test well and perform better while maintaining thermal efficiency.

x. Kathy Krafka Harkema adds that the framing is only part of the discussion when it comes to windows, and that the group is also looking at hardware, as hardware performing in fire conditions can be an issue as well as the design of the window itself. Another point to research is how the glazing is adhered to the window and how it performs in a fire. There's a lot more that needs to be researched to help insert and address those things, because, as Grant said, steel frames are not energy efficient.

xi. Milad Shabanian had previously shared with the group a couple of alternatives that the group is reviewing right now and that Daniel Gorham asked Milad to talk about. One concept is having protection on the exterior side of windows assembly for cases when the assembly is not tested. There are multiple approaches to this that the subgroup is looking into. One of the interesting parts of those is introducing shaders and exterior protections for the windows assembly. This is something that the Australian standard had for a long time and the group is looking into the possibility of introducing this to the California code as well. The subgroup is still reviewing, and this is just the initial steps of developing some concepts.

xii. Kathy Krafka Harkema states that just to complicate this further, egress needs to be considered too and make sure that whatever is developed as recommendations allows people to get out in the event of a fire or for first responders to get in.

xiii. Crystal Sujeski adds that the other thing to think about is the cost. There is a cost factor when choosing building material products and we don't want to create standards that are impossible to build, so cost is definitely a part of the equation.

10. Exterior Walls/Eaves/Soffits/Under Floors – Greg Andersen and Milad Shabanian
    i. Exterior wall subgroup will be meeting on May 20th from 1:00-2:00 pm Pacific Time and if anyone is interested, please email Greg Andersen
11. Projections/Decks (including awnings, etc.) – Paul Armstrong and Greg Andersen
    i. No updates
12. Retrofit – Marco Mack
    i. A sub-group focused on wildfire and conflagration retrofit; what would it take to put something together, how is it structured, and what's the framework.
    ii. Marco Mack says that the first step would be putting together a scope so that the Chairs have control of where the sub-group is at and where they're going.
    iii. Meetings have not started.
    iv. Marco Mack presents: "Discussion Wildfire and Conflagration Retrofit Concept" - He wants to put together a framework to start meetings to discuss the idea of combining wildfire and conflagration into retrofit. Exposure to wildfire and conflagration goes yard to yard, yard to structures, and structure to structure. The most simplistic thing is reducing fire intensity and reducing fire ignition potential will reduce the risk from wildfire and conflagration hazards. The concept of what this effort could be is to compile information to create best practices for risk reduction for exterior fire exposure in low, moderate, and high intensity fires. In Santa Cruz, Marco Mack has been helping residents work incrementally to comply with defensible space, which will reduce hazards slightly. Then a homeowner retrofit some more. So, a retrofit concept really needs to start with an idea of what the incremental steps are to become compliant and the steps past the minimum requirements of the code. Looking at homeowners' perspective and creating pathways for homeowners to reduce their hazards and lower insurance costs. There's a need for homeowners to have best practices, which in the past has focused on compliance with the regulation and Marco Mack wants to have homeowners get credited for doing more than the code minimum. Creating best practices to help the community infrastructure that'll help property owners, like an HOA best practices. That way other people can use and enforce it to a higher level. The plan also includes dealing with landscape contractors and landscape architects. There's a model that has been worked out, but not yet implemented, working with these associations to get training certifications. It would be up to the State Fire Marshal to identify some of these practices. The big one is how to verify that someone has done annual maintenance. Homeowners need this kind of effort, and the failure of retrofit comes down to maintenance. One of the challenges Marco Mack has seen looking at current codes for understanding the blind spots in the residential code and building code. They're not built for exposure fire; there are setbacks and other things all the way back from the UBC where if someone doesn't want fire to spread to their neighbors there's construction features to reduce exposure off property. There are some areas the subgroup could address to ensure people

understand those and potentially change the code. It would be looking at hazards from yards, as the building and residential codes are just setbacks and doesn't discuss hazards. The idea behind creating best practices and standards is to create simplistic solutions to complicated and complex systems. Those aspects of a difficult complex system would be interpreting fire intensity and exposure time, as well as creating a mechanism where we look at the wildfire exposure hazard. Marco Mack likes the idea of a light, ordinary, high, and extra classifications, moving away from low, moderate, high, and very high which is currently used for mapping. Some of the next steps to understand fire exposure factors would be looking at the idea of performance intent for each mitigation component: ember resistance, fire exposure resistance, easy/difficult to ignite, easy/difficult to spread, and no fire exposure (nothing to ignite/ no fire spread). An ember bounces off the structure, falls to the ground, and there's no kindling on the ground, that's an effective ember resistance for a 5-foot noncombustible zone. So, the subgroup would take these concepts and document for code enforcement. Another part of the best practices and standards involves looking at methods of judgement. There should be a low tech, repeatable process that aims for accuracy over precision with field test indicators, rather than just proof of passing a test. Homeowners may not know what the test means or the aspect of different testing processes, so field test indicators will be easier to understand. The next steps for documenting levels of mitigation would be to determine how a property owner establishes their level of fire exposure mitigation. The concept is to create a permit process where the building department and the fire department come to an existing home and meet a certain level of retrofit and get a certificate of occupancy for it. An extension of that would be modifying construction on a home built under the Uniform Building Code or the residential code and then adding a mitigation factor for wildfire yard exposures and structural mitigations. These are concepts that might fit into the aspect if we created that. If the group saw a need for that type of solution to have a formal aspect for those, and then documenting and verifying the periodic maintenance. How can someone prove that there has been maintenance on the home and yard each year to satisfy both the insurance company and the code. This idea of simplistic solutions is important and there's complexities that we can never define and we look at retrofit for incremental steps towards code compliance. Send Marco Mack an email to participate in the subgroup.

IV. ROUNDTABLE

A. Milad Shabanian asks if the work group can talk about the comments that were received and asks if the State Fire Marshal is considering any of the comments.
B. Crystal Sujeski says the comments are still under review. She then shows the Building Standards Commission website where you can view the comments and submit them. These comments are still being evaluated, some were on exterior walls causing the changes discussed earlier in the meeting, which will likely have a 15-day comment if the group can come to consensus. If not, those changes will be withdrawn.
C. Milad Shabanian asks a follow up about a comment that Kevin Scott submitted and was discussed in the California State Commissioners' meeting. But it is not on the list of comments on the website.

D. Crystal Sujeski says that comments submitted to meetings are different to comments submitted for rulemaking and will not show up in the list on the website. If someone wants to make a comment on rulemaking, they must follow the instructions found on the Notice of Proposed Action.
E. Milad Shabanian asks if the comments will be reviewed in the work group or if the State Fire Marshal will review the comments, as there are comments that he agrees with. He specifically mentions a comment submitted by L. Ross regarding Sub-Item 4-2. He does not agree with the 'field-applied' paints addition but does agree with changing chapter to section. There was another comment about a requirement for listing that was accidentally removed as it should have been in the original submittal.
F. Crystal Sujeski says that the State Fire Marshal is reviewing the comments, but there is a very short turnaround from the 45-day to the 15-day. The State Fire Marshal has to respond to each comment for the final package, and when that is heard at the Building Standards Commission there is another opportunity to provide comments.

V. UPCOMING MEETING DATES FOR 2026

A. Meetings are held on the first Wednesday of each month at 1:00 pm PDT
B. Next meeting: June 3, 2026

VI. MEETING ADJOURNMENT at 3:23 PM

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