
CWUI WORK GROUP

Meeting Minutes – October 7, 2026

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I. CALL TO ORDER – 1:02 PM PDT

A. Welcome/Introductions – John Morgan

1. The meeting was called to order by Co-Chair John Morgan, who yielded to CDA.
2. Becca Mansergh welcomed participants on behalf of Code Development and Analysis (CDA). She announced that the meeting would be recorded and that a link to the recording would be included in the meeting minutes. She asked participants to keep microphones muted unless called on, to use the raise hand feature, and to report technical issues in the chat, which CDA support was monitoring. She stated that AI note-taking tools were not authorized for the meeting. She reminded members to engage respectfully and professionally, with the goal of a collaborative environment focused on developing code proposals that improve fire and life safety. Following the announcement, she turned the meeting back over to John Morgan.

B. [Agenda](#)/Minutes Review

1. [September 2, 2026 Minutes](#)
John Morgan confirmed the minutes were posted on the website (go to the [Code Development and Analysis Work Groups](#) website page for all agendas and minutes)
2. John Morgan invited members to confirm they had reviewed the September 2, 2026 minutes and called for a motion to approve.
3. Helene Hardy Pierce raised a correction to the roofing section of the minutes, noting that two section references were listed incorrectly. The roof covering voids discussion should reference Section 504.2.1, and the gutter language should reference Section 504.2.2.
4. Motion to approve the September 2, 2026 minutes as amended was made by Bob Raymer (CBIA) and seconded by Marcelo Hirschler (GBH International). The motion carried.
5. The agenda for the current meeting was then presented and approved without discussion.
6. Motion to approve the October 7, 2026 agenda was made by Marcelo Hirschler (GBH International) and seconded by Bob Raymer (California Building Industry Association). The motion carried.

II. OLD BUSINESS

A. Sub-Groups –

1. AB 2322 CH7A ASCE 7 – [Paul Armstrong](#), [Sunup Mathew](#), and [Shamim Rashid-Sumar](#)

- i. Paul Armstrong (American Wood Council) reported that the subgroup had been meeting and deepening its analysis of how the AB 2322 legislation may affect specific agency project types. He highlighted a recent revision submitted by HCAI/OSHPD that introduced a defensible-space-like methodology applicable to I-2 occupancies, which he described as interesting and helpful. The subgroup has also engaged with the University of California system through Steve Guarino and reached out to Carlos Yado at the Cal State University Chancellor's Office of Fire Safety to assess impacts on campus projects across both systems. Paul Armstrong encouraged affected state agencies to contact the subgroup. The next meeting was scheduled for October 21, 2026, coinciding with the end of the ICC Annual Business Meeting in Nashville.

2. Roofing – [Helene Hardy Pierce](#)

- i. Helene Hardy Pierce (Asphalt Roofing Manufacturers Association) reported that the roofing subgroup had met three times since the last full group meeting and had produced four revision proposals.
- ii. Proposal 1 – Eave Openings (Section 504.2.1.2): The subgroup proposed eliminating the term "bird stop" and replacing the existing language with: "Voids at the eaves shall be protected with noncombustible materials with openings or gaps no greater than 0.5 inch to prevent the intrusion of debris." The rationale was that bird stops are not designed to prevent ember intrusion, and adding a measurable maximum gap provides clearer, more enforceable guidance.
- iii. Several members raised concerns about the half-inch maximum gap. Marcelo Hirschler (GBH International) argued the gap was too large to prevent meaningful intrusion. Chrishana Fields (OSFM - Code Development and Analysis) suggested the group consider an eighth-inch opening, consistent with other Part 7 requirements. Greg Andersen (Insurance Institute for Business and Home Safety) clarified that the original intent of bird stops was to prevent debris accumulation, not direct ember intrusion, since the assembly already includes an underlayment below. Kevin Reinertson acknowledged the complexity of achieving very small gaps with standard roofing materials such as tile, noting that the overlap geometry of tile itself creates voids, and that a half-inch was considered achievable by industry participants. Milad Shabanian (Stantec) raised the question of how building inspectors would enforce a specific gap measurement in the field. Kevin Reinertson responded that, as with other code provisions, inspectors exercise professional judgment, noting that a tolerance of slightly over a half-inch would likely not result in a citation if the intent was otherwise met.

- iv. Marcelo Hirschler (GBH International) entered the relevant eave protection language from the 2027 International Wildland-Urban Interface Code (IWUIC), Sections 505.2 and 505.3, into the chat as a reference. Following discussion, the subgroup agreed to revisit the eave proposal at its next meeting and compare it against the IWUIC language before finalizing.
- v. Proposal 2 – Cleanup of Section 503 (Fire Retardant Treated Wood): The subgroup discussed possible revisions to sections 503.1, 503.3, and 504.2 regarding roofing and relocating the fire retardant treated wood shingle requirements into the roof assembly section (504.2), where they would be more logically placed. Marcelo Hirschler (GBH International), speaking for the Weathering/Ignition-Resistant Materials subgroup, recommended against deletion of Section 503.3, arguing the material belongs within the 503 section framework alongside other ignition-resistant and fire-resistant material provisions. Greg Andersen (Insurance Institute for Business and Home Safety) noted that the health and safety code specifically authorizes fire retardant treated shingles and requires SFM listing, so the provision must remain accessible somewhere in the code. Following this discussion, John Morgan indicated the two subgroups should coordinate before finalizing any proposal on this section.
- vi. Scott Woody (OSFM – Fire and Life Safety) raised a separate concern, noting that Health and Safety Code Section 13132.7 may conflict with more stringent roofing classification requirements being developed. Marcelo Hirschler (GBH International) and Kevin Reinertson clarified that the current subgroup proposals do not change the Class-A roof classification requirement, which was adopted in a prior cycle. Greg Andersen (Insurance Institute for Business and Home Safety) noted that legal counsel previously reviewed the statute's "at least Class B" language and determined Class B was the minimum and a more restrictive requirement (i.e. Class A) would be consistent with the statute.
- vii. Proposal 3 – Gutters (Section 504.4): The subgroup proposed adding language requiring that materials used to restrict accumulation of leaves and debris in gutters—such as gutter guards—be constructed of noncombustible material, in addition to the existing requirement that gutters and downspouts themselves be noncombustible. The proposal also reorders the sentence for clarity.
- viii. Proposal 4 – Valley Flashing (Cleanup): The subgroup proposed correcting an unintended drafting error from a prior cycle in which the revised language could be read to require two layers of metal in valley flashings. The proposal clarifies that a valley flashing assembly may consist of either: (1) a minimum 26-gauge noncorrosive metal over a D3909 cap sheet (the existing prescriptive path), or (2) a performance path using a noncombustible, corrosion-resistant metal flashing with an underlayment of minimum 36-inch width running the full length of the valley, tested and listed as Class A per ASTM E108 or UL 790. The proposal also clarifies that only one layer of metal is required and

accommodates alternatives such as copper flashing. No objections were raised. The subgroup will meet the following Monday to continue work.

3. Accessory Structures – [Milad Shabanian](#)

- i. Milad Shabanian (Stantec) was unavailable. Greg Andersen (Insurance Institute for Business and Home Safety) provided a brief update, noting that the subgroup has been engaged in extensive discussion around defining the scope of accessory buildings, particularly how Zone 0 defensible space requirements interact with detached structures, and how to address structures of different sizes (over and under 120 square feet) within 30 feet of an applicable structure. No formal proposal is ready at this time, but the group remains active.

4. Weathering / Ignition-Resistant Materials – [Marcelo Hirschler](#) and [Chrishana Fields](#)

- i. Marcelo Hirschler (GBH International) presented four proposals from the subgroup, with the first three moving toward consensus and the fourth remaining under discussion.
- ii. Items 1–3 (Consensus): The group confirmed consensus on three items: (1) clarifying that the CWUI code is an overlay and either the California Building Code or the California Residential Code also applies to applicable buildings; (2) incorporating into Section 503.2 a list of five material categories for which noncombustibility testing is not required—steel, plain concrete and masonry, glass (excluding plastic glazing), and specific aluminum alloy series (3xx, 5xx, and 6xx)—mirroring language already in the CBC and IWUIC; and (3) an editorial clarification to the fire retardant treated wood weathering requirement, making explicit that products must meet fire test requirements after weathering, not just before or at the time of manufacture.
- iii. Item 4 – Relocation of Roof Covering Provisions (Section 503.3/503.5.4): The subgroup proposed relocating Section 503.3.5.4 to 503.3 to place FRTW roof coverings into a single location. However, Marcelo Hirschler (GBH International), Scott Woody (OSFM – Fire and Life Safety), and others noted confusion over the correct section numbering following the interim rulemaking cycle's renumbering, and Kevin Reinertson confirmed that what had been 503.3.4 was renumbered to 503.5.4. Marcelo Hirschler (GBH International) stated a willingness to adjust the number, but Greg Andersen (Insurance Institute for Business and Home Safety) emphasized that the health and safety code specifically authorizes this product category, and the provision must remain visible and accessible. Given these complications and the overlap with the roofing subgroup's work, the subgroup agreed to defer Item 4 for coordination between the two groups.
- iv. Unresolved Issues: Marcelo Hirschler (GBH International) identified two outstanding areas being discussed. First, the existing prohibition on coated materials: the subgroup has general consensus that the prohibition could be removed if replaced by an equivalent assurance of fire performance, but there is disagreement on whether weathering

should be verified by an AHJ-approved process rather than self-certification by manufacturers. Second, the treatment of plastic lumber and wood-plastic composite (WPC) materials: some manufacturers claim that weathering does not change the fire performance of the products, but no evidence has been submitted demonstrating compliance with ASTM E2768 (the fire test standard), and much of the existing research is over 15 years old and does not cover currently listed materials. Marcelo Hirschler (GBH International) also noted that most plastic lumber/WPC products are polyethylene-based, which differs from PVC-based examples that have been cited in discussion. The subgroup's next meeting was scheduled for the following week, and Marcelo Hirschler (GBH International) invited interested parties to contact him to be added to the invitation list.

5. Vents – [Kevin Scott](#)

- i. Kevin Scott (KH Scott & Associates LLC) was not present. Greg Andersen (Insurance Institute for Business and Home Safety) and Marcelo Hirschler (GBH International) provided an informal update. The central issue is whether intumescent coatings used on WUI vents maintain their fire performance after weathering exposure. The subgroup has been evaluating ASTM D2898 (Methods A and B) as the weathering standard, with Method B—which includes UV exposure in addition to water and temperature cycling—being the leading candidate. A key advantage of D2898 is that its specimen holder is large enough to accommodate full vent assemblies. Slate Bryer (New Cal Metals) clarified that because D2898 does not specify mounting orientation, the subgroup is considering adding code language requiring that vents be mounted in their intended installation orientation during testing. Marcelo Hirschler (GBH International) confirmed there is group consensus that weathering testing is necessary given the use of intumescent paints and coatings on these products.

6. Chapters 2/6 – [Larry Williams](#)

- i. Larry Williams (Ventura County) and Kevin Reinertson presented a series of proposed changes to Chapters 2, 3, 5, and 6, framed around the challenge of correctly applying the CWUI code's requirements across different fire hazard severity zone designations following the release of the LRA maps and the resulting emergency and interim rulemaking.
- ii. Larry Williams (Ventura County) explained that when the CWUI code was originally converted, the LRA maps had not yet been released, so all provisions were calibrated for SRA and LRA Very High zones. The subsequent phased release of LRA maps—including High and Moderate zones—created confusion among local jurisdictions about where code provisions apply, because the defined term "WUI area" now encompasses LRA High zones that were never intended to be subject to certain provisions (particularly those in Chapters 4 and 6).
- iii. Proposed Definition Revision – WUI Area: The group proposes retaining the current scope, which ties the WUI definition to SRA plus LRA High

- and Very High zones, but spelling out specific applicability zone-by-zone within the scope section of each chapter rather than relying solely on the global WUI definition.
- iv. Chapter 6 – Defensible Space: Larry Williams (Ventura County) proposed replacing the reference to "WUI area" in the Chapter 6 applicability provisions with explicit references to SRA, LRA Very High, and locally designated areas by ordinance—reflecting the actual statutory basis for defensible space requirements under the Public Resources Code and Government Code. He also proposed deleting the word "unincorporated" from the applicability provision as redundant (all SRA lands are by definition unincorporated). Larry Williams (Ventura County) further proposed updating Section 603.2 to reflect the Board of Forestry's updated grade-based spacing regulations and Section 604.3 to incorporate both the "spaced" language added by recent statute and updated references to Title 14 regulations, specifically Article 1299 for the LRA.
 - v. Marcelo Hirschler (GBH International) expressed concern about departing from the IWUIC structure by explicitly restating zone applicability in each chapter, arguing the code's scope should handle this and exceptions should be noted where applicable. Larry Williams (Ventura County) and Kevin Reinertson responded that the statute constrains California in ways the IWUIC does not, and that writing exceptions into each chapter would actually produce more text than the proposed approach. Kevin Reinertson emphasized that local jurisdictions are currently confused and are inadvertently applying requirements in areas where there is no statutory basis to do so.
 - vi. Chapter 4 – Access and Water Supply: Larry Williams (Ventura County) presented related proposals for Chapter 4, applying the same zone-specificity approach to access requirements and water supply provisions. He noted that the State Fire Marshal does not adopt access standards (that authority rests with the Board of Forestry for SRA and LRA Very High), but California Fire Code requirements still apply in WUI areas. Larry Williams (Ventura County) also proposed adding a pointer to Chapter 6 for fire protection plans, which were relocated there in a prior cycle, and discussed the redundancy of the defensible space definition reprinted in Chapter 4 versus the one in Chapter 6, suggesting it may be deleted from Chapter 4 since it is not used in that chapter's substantive provisions. Kevin Reinertson noted that the two definitions serve different regulatory contexts (BOF 1270 vs. 1299 provisions). Matt Damon (OSFM - Community Wildfire Preparedness and Mitigation) suggested using the government code statutory definition for Chapter 2 to resolve the ambiguity, but Larry Williams (Ventura County) indicated that idea required further development before presentation.
 - vii. The subgroup document was shared on screen and will be distributed to the full group for written feedback. Larry Williams (Ventura County) emphasized that final decisions on these items need to be made by the January meeting to meet the February submission deadline.

7. Chapter 4 – [Matthew McKenna](#) and [Larry Williams](#)
 - i. Matthew McKenna (Santa Clara County Fire Department) was on vacation and had not yet convened a formal subgroup meeting for Chapter 4 as a standalone group. Larry Williams (Ventura County) noted that Chapter 4 had previously been combined with Chapters 2 and 6, and that the proposals he presented under the prior agenda item substantially cover the Chapter 4 discussion as well. No additional update was provided.
8. Windows/Doors – [Daniel Gorham](#) and [Greg Andersen](#)
 - i. Daniel Gorham (UL Research Institutes) was not present. Greg Andersen (Insurance Institute for Business and Home Safety) reported that the subgroup is pursuing several lines of work, including discussion of glass block (still in early stages with no strong traction), a revision to SFM Standard 12-7A-2 being led by Daniel Gorham (described as progressing well), and a proposal to revise Section 504.8 related to window requirements in building-to-building exposure scenarios, which would require higher-rated construction when structures are in close proximity. That proposal is expected to be ready for the next meeting.
 - ii. Jennifer Hatfield (J. Hatfield & Associates, PL) added that the subgroup had been close to presenting a proposal that breaks out window and skylight requirements into separate product-category subsections, but received substantive feedback in the 36 hours prior to the meeting and will refine the proposal for the next subgroup meeting. The next subgroup meeting is scheduled for Tuesday, October 13.
9. Exterior Walls/Eaves/Soffits/Under Floors – [Greg Andersen](#) and [Milad Shabanian](#)
 - i. Greg Andersen (Insurance Institute for Business and Home Safety) reported that the exterior walls subgroup is working on: (1) language around mass timber terminology; (2) provisions for exterior wall exposure differentiated by whether the ignition source is a vegetation fire versus a structure-to-structure fire, with higher construction requirements for the latter; (3) editorial cleanup of existing rafter tail details; and (4) updates to eave provisions in connection with the structure exposure proposal.
10. Projections/Decks (including awnings, etc.) – [Paul Armstrong](#) and [Greg Andersen](#)
 - i. Greg Andersen (Insurance Institute for Business and Home Safety) reported that the subgroup has encountered unexpected complexity in attempting to define "projection" clearly enough to confirm whether porch ceilings remain covered under that term (which was the prior cycle's intent). The definitional challenge has prompted discussion of alternative approaches, including a definition with exceptions or cross-references to other sections covering decks and eaves separately. Kevin Scott (KH Scott & Associates LLC) is now leading work on a proposed definition. The issue has generated robust discussion across subgroup meetings.

11. Retrofit – [Marco Mack](#)

- i. Marco Mack reported that the retrofit subgroup has not met since the last full group meeting. He summarized the group's proposed deliverable: a voluntary best practices guideline structured as a new appendix, incorporating concepts from existing established documents and organized into tiered levels of protection ranging from below code minimum to above code minimum. He noted that the Federal Coordinating Agency Committee (FCAC) Work Group 7B ("Tiered Approach") is pursuing a parallel effort, and that the retrofit subgroup intends to draw from the FCAC meeting outcomes. Marco Mack shared a Teams meeting link in the chat for the FCAC Work Group 7B meeting scheduled for the following morning at 9:00 AM and invited members to participate.

12. Exterior Sprinklers – [Kevin Scott](#)

- i. Kevin Scott (KH Scott & Associates LLC) was not present. Greg Andersen (Insurance Institute for Business and Home Safety) and Kevin Reinertson provided an update. The subgroup has reached general agreement that exterior sprinkler systems should never be used in lieu of defensible space or code-required building construction, but acknowledges they may provide supplemental benefit. The work is focused on updating the language in the existing appendix rather than the base code chapters. Key issues under discussion include: the absence of any applicable national standard; the practical and safety implications of water supply capacity during a fire event (including the possibility of a flow-limiting shutoff to preserve water for fire department suppression); and the importance of maintenance requirements over time. Marcelo Hirschler (GBH International) noted that the subgroup reviewed an Australian standard but determined it was not appropriate for use in California. He referenced Annex G of the IWUIC as a relevant reference point. Kevin Reinertson emphasized that the subgroup's goal is to avoid giving occupants a false sense of security in the absence of a recognized national standard, and encouraged interested parties to contact Kevin Scott (KH Scott & Associates LLC) to join the subgroup.

III. NEW BUSINESS

- A. Larry Williams (Ventura County) raised two questions under New Business that had also been posed at the prior meeting: (1) whether the State Fire Marshal intends to consolidate maintenance-related provisions from various chapters into new Chapter 7; and (2) whether there is any consideration of extending Chapter 5 building requirements to LRA Moderate zones in this rulemaking cycle. The Chair confirmed both questions were received at the September meeting and that CAL FIRE is still working on responses.

IV. ROUNDTABLE/PUBLIC COMMENTS

- A. John Morgan noted his upcoming retirement, effective December 30, 2026, and members extended congratulations.
- B. Marcelo Hirschler (GBH International) advised that he would not be present at the November meeting due to an ASTM plastics committee meeting and indicated he would submit written comments in advance.

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: November 4, 2026

VI. MEETING ADJOURNMENT – 3:04 PM PDT

- A. Motion to adjourn was made by Marcelo Hirschler (GBH International), seconded by Greg Andersen (Insurance Institute for Business and Home Safety), the motion carried, and John Morgan adjourned the meeting.

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

<https://youtu.be/f58u2S9YlyM>

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