# COMMISSION ACTION MATRIX – YELLOW BUILDING, FIRE and OTHER (BFO) CODE ADVISORY COMMITTEE

## 2025 CALIFORNIA FIRE CODE, TITLE 24, PART 9, 2024 INTERNATIONAL FIRE CODE (IFC), AGENCY: OFFICE OF THE STATE FIRE MARSHAL, SFM 06/24

### LEGEND:

**CAC Actions:** Approve, Disapprove, Approve as Amended, Further Study Required, Not Applicable (Items not revied by CAC)

**Agency Responses:** Accept, Disagree, Withdraw, Not Applicable (Items added Post CAC or 45-Day Public Comment Period)

**CBSC Actions:** Approve, Disapprove, Approve as Amended, Further Study Required

**Matrix Paper Color** (for commission action only): GREEN = uncontested items, YELLOW = challenged items, SALMON = withdrawn, no action required

If using assistive technology, please adjust your settings to recognize underline, strikeout, italic and ellipsis.

* Model Code language appears upright
* Existing California amendments appear in *italic*
* Amended model code or new California amendments appear *underlined & italic*
* Repealed model code language appears ~~upright and in strikeout~~
* Repealed California amendments appear in *~~italic and strikeout~~*
* Ellipses (…) indicate existing text remains unchanged

### ITEM 1 Chapter 1 SCOPE AND ADMINISTRATION, DIVISION I CALIFORNIA ADMINISTRATION, DIVISION II SCOPE AND ADMINISTRATION

Adopt sections of the 2024 IFC as listed in the Express Terms and bring forward existing amendments from the 2022 CFC to 2025 CFC with modifications in sections listed below.

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| **SFM 09/24 ITEM 1** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **1-5** | **105.5.14 Energy Storage Systems.** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsFurther Study Required | New amendment regarding requirements for Operational Permits.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |

### ITEM 2 CHAPTER 2 DEFINITIONS

Adopt 2024 IFC Chapter 2 and carry forward existing amendments from 2022 CFC to 2025 CFC with modifications as listed below.

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| **SFM 06/24**  **ITEM 2** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **2-6** | **FLAMMABLE GAS.** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend | Repeal and replace existing amendment with model code.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **2-10** | ***Iron-air aqueous battery.*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend | Adopt new definition.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **2-12** | **Lithium-ion battery.** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsDisapprove | Amend IFC definition of Lithium-ion battery.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **2-13** | **~~Lithium metal polymer~~ *Lithium-sulfur rechargeable* battery.** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend. | Amend IFC definition of polymer battery.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **2-14** | **Nickel-cadmium (Ni-Cd) battery.** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend | Amend IFC definition of Nickel-cadmium (Ni-Cd) battery.  **Post 45-Day:**  No change as a result of these comments. See FSOR. |  |
| **2-16** | ***Nickel Iron (Ni-Fe).*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend | Adopt new definition.  **Post 45-Day:**  No change as a result of these comments. See FSOR. |  |
| **2-17** | **Nickel-metal hydride (Ni-MH).** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend | Amend IFC definition of Nickel-metal hydride.  **Post 45-Day:**  No change as a result of these comments. See FSOR. |  |
| **2-21** | ***Sodium nickel chloride (NaNiCl).*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsDisapprove | Adopt new definition.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **2-25** | ***Zinc bromide.*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend | Adopt new definition.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **2-26** | ***Zinc manganese dioxide (Zn-MnO₂).*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend | Adopt new definition.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **2-27.1** | **Section 203.4.2 Group E, child-care facilities. *Exception:*** | **Not Applicable** | **See ISOR** | **45-Day:**  M.Cottrillt, Head Start Recommends Disapprove  SL.Velte, Associated Students, Inc. Recommends Disapprove  T.Kim, Children’s Institute Recommends Disapprove  S.Orum, California Department of Social Services Recommends Approve as Amended | **Post CAC:** Item added after CAC meeting. Not reviewed by CAC. This proposal amends the exception to Group E child-care facilities to rectify discrepancies in associated code sections.  This Item is associated with SFM 46/24, Part 2, Item 3-0. See ISOR.  **Post 45-Day:** SFM proposed editorial amendment in FET Addendum. The proposed edit is not related to the public comments.  No change as a result of these comments. See FSOR |  |
| **2-27.2** | **Section 203.7.4.1 Classification as Group E. *Special provisions.*** | **Not Applicable** | **See ISOR** | **45-Day:**  M.Cottrillt, Head Start Recommends Disapprove  SL.Velte, Associated Students, Inc. Recommends Disapprove  T.Padgett, Recommends Disapprove  S.Orum, California Department of Social Services Recommends Disapprove | **Post CAC:** Item added after CAC meeting. Not reviewed by CAC. This proposal amends Group E child-care facilities to reinstate subsections of Group I-4 and proposes special provisions.  This Item is associated with SFM 46/24, Part 2, Item 3-1.3. See ISOR.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |

### ITEM 3 CHAPTER 3 GENERAL REQUIREMENTS

Adopt sections as listed in Express Terms of 2024 IFC Chapter 3 and carry forward existing amendments from 2022 CFC to 2025 CFC with modifications as listed below.

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| **SFM 06/24**  **ITEM 3** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **3-5** | ***320.4.1.1 Used or unwanted battery collection.*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsDisapprove | Add new amendment.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **3-6** | ***320.4.1.2 Waste storage.*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend. | Add new amendment.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **3-7** | ***320.4.1.3 Miscellaneous storage.*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend. | Add new amendment.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **3-12** | ***~~320.4.3.2~~ 320.4.3.3* Storage area size limits and separation.** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend. | Renumber, delete reference to Section 414.6.1’ and increase separations between multiple battery storage areas to 20 feet minimum.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |
| **3-16** | ***320.5 Other battery types general.***  ***320.5.1 Structural and seismic design.***  ***320.5.2 Impact protection.***  ***320.5.3 Battery charging.***  ***320.5.4 Mechanical exhaust system.***  ***320.5.5 Spill control.***  ***320.5.6 Hazard warning signage.*** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY  RecommendsAmend for Section 320.5.4 | Add new amendments in Sections 320.5 through 320.5.6.  **Post 45-Day:**  No change was made to Section 320.5.4 as a result of these comments. See FSOR. |  |

### ITEM 5 CHAPTER 5 FIRE SERVICE FEATURES

Adopt 2024 IFC Chapter 5 (except sections 503 and 510.2) and carry forward existing amendments from 2022 CFC to 2025 CFC without modification. [Revised Post 45-day.]

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| **SFM 06/24**  **ITEM 5** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **5-1** | **Chapter 5** | **Approve** | **Accept** | **45-Day:**  J. Costello, LA County Fire. Recommend: Amendcharging language.  K.Dalley, Travel Violence Rapid Response (TVRR) with 20 signatories. Also submitted by R.Raburn with 6 signatories and Walk-Bike-Berkley with 3 signatories Recommendations: Amend | Adopt Chapter 5 (except sections 503 and 510.2) and carry forward existing amendments without modification.  **Post 45-Day:** SFM revised the charging language in the FET and FSOR in response to J. Costello comment.  No change as a result of other comments. See FSOR |  |

### ITEM 9 CHAPTER 9 FIRE PROTECTION AND LIFE SAFETY SYSTEMS

Adopt 2024 IFC Chapter 9 sections as specified in the Express Terms and carry forward existing amendments from 2022 CFC to 2025 CFC with modifications as listed below.

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| **SFM 06/24**  **ITEM 9** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **9-4** | **903.3.1.1.1 Exempt locations.** | **Approve** | **Accept** | **45-Day:**  S.Weiss-Ishai, San Francisco Fire Department (SFFD),  Recommends Amend | Repeal amendment no longer needed due to the removed model code and renumber.  **Post 45-Day:** Item added to 15-Day Express Terms as a result of comments received. |  |
| **9-14.1** | **907.2.9.3. Group R-2 college and university buildings.** | **Not Applicable** | **Not Applicable** | **45-Day:**  S.Weiss-Ishai, San Francisco Fire Department (SFFD)  Recommends Amend | **Post 45-Day:** SFM added this item to 15-Day Express Terms in coordination with comments received on SFM Parts 2 and 9 rulemaking regarding smoke alarms and detectors listed in accordance with UL 268.  Comments directly relate to SFM 04/24 Part 2 package, Item 10-12.1. See FSOR. |  |

### ITEM 11 CHAPTER 11 CONSTRUCTION REQUIREMENTS FOR EXISTING BUILDINGS

Adopt 2024 IFC Chapter 11 sections as specified in the Express Terms and carry forward existing amendments from 2022 CFC to 2025 CFC with modifications as listed below.

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| **SFM 06/24**  **ITEM 11** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **11-1** | **SECTION 1107**  **ENERGY STORAGE SYSTEMS** | **Approve** | **Accept** | **45-Day:**  C.Seal, NEXTera ENERGY,  Amend | Adopt 2024 IFC Section 1107.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |

### ITEM 13 CHAPTERS 13-19 RESERVED

Delete 2024 IFC Chapters 13-19 in their entirety. Do not print in the 2025 California Fire Code.

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| **SFM 06/24**  **ITEM 13** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **13-1** | **Chapters 13-19 *RESERVED*** | **Approve** | **Accept** | **45-Day:**  J. Costello, LA County Fire.  Recommends printing “Reserve” for deleted chapters. | Continue to reserve these chapters.  **Post 45-Day:** No change as a result of these comments. See FSOR |  |

**ITEM 35  
CHAPTER 41** **TEMPORARY HEATING AND COOKING OPERATIONS**

Adopt 2024 IFC Chapter 41 except Section 4106. [Amended post 45-Day]

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| **SFM 06/24**  **ITEM 35** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **35-1** | **Chapter 41** | **Further Study Required** | **Accept** | **45-Day:**  J. Costello, LA County Fire.  Amendcharging language. | Delete 2024 IFC Chapter 41 in its entirety. Do not print in the California Fire Code.  **CAC:** Further Study Required under Criteria #4, 6. SFM to clarify if they intent to adopt 2024 IBC Chapter 41.  SFM commented, “intended to adopt.”  **Post CAC:** SFM proposes to adopt Chapter 41 and as modified the Express Terms and ISOR.  **Post 45-Day:** SFM amended the charging language. See FSOR. |  |

### ITEM 36 CHAPTERs 42 THROUGH 47 – RESERVED

Chapters 42-47 are reserved in 2024 IFC.

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| **SFM 06/24**  **ITEM 36** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **36-1** | **Chapters 42 – 47** | **Approve** | **Accept** | **45-Day:**  J. Costello, LA County Fire.  Recommends printing “Reserve” for deleted chapters. | Chapters 42-47 are reserved in 2024 IFC.  **Post 45-Day:** No change as a result of these comments. See FSOR |  |

### ITEM 57 CHAPTERS 68 THROUGH 79 – RESERVED

Chapters 68 – 79 are reserved in 2024 IFC.

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| **SFM 06/24**  **ITEM 57** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **57-1** | **Chapters 68 – 79** | **Approve** | **Accept** | **45-Day:**  J. Costello, LA County Fire. Recommends printing “Reserve” for deleted chapters. | Chapters 68 – 79 are reserved in 2024 IFC.  **Post 45-Day:** No change as a result of these comments. See FSOR |  |

**ITEM 58  
CHAPTER 80 REFERENCED STANDARDS**

Adopt 2024 IFC Chapter 80 and carry forward existing amendments from 2022 CFC with additional modifications.

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| **SFM 06/24**  **ITEM 58** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **58-1** | **NFPA**  **11—~~21~~ *24***  **13—~~22~~ *25***  **13D—~~22~~ *25***  **13R—~~22~~ *25***  **14—~~22~~ *24***  **17—~~21~~ *24***  **17A—~~21~~ *24***  **20—~~22~~ *25***  **24—~~22~~ *25***  **31—~~20~~ *24***  **33—~~21~~ *24***  **34—~~21~~ *24***  **40—~~22~~ *25***  **45—~~23~~ *24***  **52—~~22~~ *23***  **58—~~23~~ *24***  **59A—~~22~~ *24***  **69—~~19~~ *24***  **72—~~22~~ *25***  **76—~~20~~ 24**  **80—~~22~~ *25***  **92—~~21~~ *24***  **105—~~22~~ *25***  **110—~~22~~ *25***  **111—~~2~~*~~2~~ 25***  **120—~~20~~ *23***  **170—~~21~~ *24***  **204—~~21~~ *24***  **260—~~23~~ *24***  **286—~~23~~ *24***  **318—~~22~~ *25***  **326—~~20~~ 25**  **400—~~22~~ 25**  **410—~~20~~ 25**  **505—~~23~~ 24**  **855—~~20~~ *23***  **914—~~23~~ 24**  **1122—~~18~~ 22**  **1124—~~06~~ 22**  **1225—22**  **2010—~~20~~ 23** | **Approve as Amended** | **Accept** | **45-Day:**  S.Weiss-Ishai, SFFD  Amend Referenced Standard NFPA 13-25 | Update and revise NFPA referenced standards.  **CAC:** Approve as Amended under Criteria #7. SFM to propose updating the referenced standard NFPA 855 to 23 edition.  **Post CAC:** SFM updated the Express Terms.  **Post 45-Day:** Express Terms revised and added to 15-Day Express Terms as a result of a public comment. See FSOR.  Public Comments regarding NFPA 13-25 directly relate to SFM 04/24 Part 2 package, Item 33-6. |  |

### ITEM 60 APPENDICES A, D THROUGH G, AND I THROUGH P

SFM does not adopt 2024 IFC Appendices A, D, E, F, G, I, J, K, L, M, N, O, P.

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| **SFM 06/24**  **ITEM 60** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **60-1** | **Appendices A, D, E, F, G, I, J, K, L, M, N, O, P.** | **Approve** | **Accept** | **45-Day:**  K.Dalley, Travel Violence Rapid Response (TVRR) with 20 signatories. Also submitted by R.Raburn with 6 signatories and Walk-Bike-Berkley with 3 signatories Recommendations: Amend | SFM does not adopt 2024 IFC Appendices A, D, E, F, G, I, J, K, L, M, N, O, P.  **Post 45-Day:**  No change as a result of these comments. See FSOR |  |