# COMMISSION ACTION MATRIX BUILDING, FIRE AND OTHER (BFO) CODE ADVISORY COMMITTEE

## 2025 CALIFORNIA RESIDENTIAL CODE (CRC), TITLE 24, PART 2.5, 2024 INTERNATIONAL RESIDENTIAL CODE (IRC) AGENCY: STATE FIRE MARSHAL, SFM 05/24

### LEGEND:

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

**Agency Responses:** Accept, Disagree, Withdraw

**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**Matrix Paper Color** (for commission action only): GREEN = uncontested items, YELLOW = challenged items, SALMON = withdrawn, no action required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* Repealed model code language appears ~~upright and in strikeout~~
* Repealed California amendments appear in *~~italic and strikeout~~*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 AND DIVISION II SCOPE AND ADMINISTRATION

Adopt sections of the 2024 IRC listed in Express Terms and bring forward existing amendments from the 2022 CRC to 2025 CRC 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** |
| **1-1** | ***1.1.1 Title.*** | **Approve** | **Accept** |  | Update the year of the model code being adopted in this cycle from 2021 IEBC to 2024 IEBC. |  |
| **1-2** | ***1.1.3 Scope.*** | **Approve** | **Accept** |  | Update reference pointers. |  |
| **1-3** | ***1.1.3.1 Classification.*** | **Approve** | **Accept** |  | Update reference pointers. |  |
| **1-3.1** | ***1.11.2.4 Request for alternative means of protection*** | **Approve** | **Accept** |  | Update Title 19 section reference |  |
| **1-4** | ***R102.8 Wildland Urban Interface*** | **Approve** | **Accept** |  | Add new section to provide reference to Part 7, California Wildland Urban Interface Code. |  |
| **1-5** | **R105.2 Work exempt from permit.** | **Approve** | **Accept** |  | Revise pointer to refer to Title 24, Part 7. |  |
| **1-6** | ***105.5.1 Expiration. [SFM]*** | **Approve** | **Accept** |  | Co-adopt existing BSC amendment. |  |

### ITEM 2 CHAPTER 2 DEFINITIONS

Adopt 2024 IRC Chapter 2 as specified in the Express Terms and bring forward existing amendments with modification as listed below.

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| **SFM 09/24 ITEM 2** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **2-1** | ***~~ENERGY STORAGE SYSTEM (ESS).~~***  ***~~PHOTOVOLTAIC (PV) PANEL SYSTEM, GROUND MOUNTED.~~***  ***~~PHOTOVOLTAIC (PV) SUPPORT STRUCTURE, ELEVATED.~~*** | **Approve** | **Accept** |  | Repeal existing amendments and replace with model code definitions. |  |

### ITEM 3 CHAPTER 3 BUILDING PLANNING

Adopt sections listed in Express Terms and bring forward existing amendments from the 2022 CRC into the 2025 CRC with modifications in sections listed below.

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| **SFM 05/24 ITEM 3** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **3-1** | **R302.1 Exterior walls.** | **Approve** | **Accept** |  | Update reference pointer. |  |
| **3-2** | **TABLE R302.1(2)** | **Approve** | **Accept** |  | Move forward existing amendments, modify the title, and update reference pointer. |  |
| **3-3** | **R302.2.2 Common Walls.** | **Approve** | **Accept** |  | Update reference pointer. |  |
| **3-4** | **R302.2.6 Structural Independence.** | **Approve** | **Accept** |  | Update reference pointer. |  |
| **3-5** | **R302.3.2 Fire-resistance rating.**  **R302.3.5 Vertically stacked dwelling units.** | **Approve** | **Accept** |  | Update reference pointers. |  |
| **3-6** | **R302.5.1 Opening protection.** | **Approve** | **Accept** |  | Update reference pointer. |  |
| **3-7** | ***~~R302.9.5~~ R302.9.4.1 Stability.*** | **Approve** | **Accept** |  | Renumber existing amendment. |  |
| **3-8** | **R302.13 Fire protection of floors.** | **Approve** | **Accept** |  | Update reference pointer. |  |
| **3-9** | ***~~R316.2.1~~ R303.2.1* *Labeling of polystyrene foam insulation without flame retardants.*** | **Approve** | **Accept** |  | Renumber existing amendment. |  |
| **3-10** | **R310.2.2, R310.3, R310.3.1,**  ***~~R314.3.2~~**R310.3.2 …***  ***~~R314.3.3~~ R310.3.3 …***  **R310.4Interconnection.** | **Approve** | **Accept** |  | Revise and update reference pointers.  Update, carry forward and renumber existing amendments due to model code reorganization. |  |
| **3-11** | ***~~R314.8~~ R310.8 …***  ***~~R314.8.1~~ R310.8.1 Group R-3 Effective Date.***  ***~~R314.8.2~~ R310.8.2 Health and Safety Code Section 13113.7.***  ***~~R314.8.3~~ R310.8.3 ~~For purposes of clarification~~ Health and Safety Code Section 13113.8.*** | **Approve** | **Accept** |  | Carry forward existing amendments and renumber sections due to model code reorganization. Revise section titles to identify that the Health and Safety Code Sections have been reprinted for the Code User ease. |  |
| **3-12** | **R317.5 Fire sprinklers *location on property.*** | **Approve** | **Accept** |  | Update reference pointer. |  |
| **3-13** | ***~~R309.6~~* *R317.5.1 Fire Sprinklers, Attached Garages and Carports with Habitable Space Above.*** | **Approve** | **Accept** |  | Carry forward existing amendments and renumber sections due to model code reorganization. |  |
| **3-14** | **R319.1 Emergency escape and rescue opening required.** | **Approve** | **Accept** |  | Update reference pointers. |  |
| **3-15** | **R330.4 Locations.** | **Approve** | **Accept** |  | Repeal existing amendment. |  |
| **3-16** | **R330.5 Energy Ratings.**  ***Table ~~R328.5~~ R330.5*** | **Approve** | **Accept** |  | Delete model code language and retain existing amendment with modifications to the reference pointers. Renumber existing table due to model code reorganization. |  |
| **3-17** | **R330.7 Fire Detection.** | **Approve** | **Accept** |  | Carry forward existing amendment to this section, which was renumbered at the model level. |  |
| **3-18** | ***~~R328.8.1 Garages.~~***  ***~~Figure R328.8.1~~***  ***~~R328.8.2 Other locations subject to vehicle impact.~~***  ***~~R328.8.3 Impact protection options.~~*** | **Approve** | **Accept** |  | Repeal and replace existing amendments in Sections R328.8.1, R328.8.2, R328.8.3 and Figure R328.8.1 with model code language |  |
| **3-19** | ***~~R328.12~~ R330.12 Toxic and highly toxic gas.*** | **Approve** | **Accept** |  | Renumber due to model code reorganization. |  |
| **3-20** | ***R337 MATERIALS AND CONSTRUCTION METHODS FOR EXTERIOR WILDFIRE EXPOSURE***  ***User Note:*** | **Approve** | **Accept** |  | Relocate the provisions of Section R337 to the new Title 24, Part 7, California Wildland Interface Code (CWUIC). Add a User Note that provides a pointer to CWUIC. |  |

### ITEM 4 CHAPTERS 4 THROUGH 7

SFM does not adopt 2024 IRC Chapters 4 through 7.

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| **SFM 09/24 ITEM 4** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **4-1** | **Chapters 4 through 7** | **Approve** | **Accept** |  | SFM does not adopt Chapters 4 through 7. |  |

### ITEM 5 CHAPTER 8 ROOF-CEILING CONSTRUCTION

Adopt sections listed in Express Terms and bring forward existing amendments from the 2022 CRC into the 2025 CRC with modifications in sections listed below.

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| **SFM 09/24 ITEM 5** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **5-1** | ***R806.1.1*** ***Vents in the Wildland Urban Interface (WUI).*** | **Approve** | **Accept** |  | Update existing amendment to refer to Title 24, Part 7. |  |

### ITEM 6 CHAPTER 9 ROOF ASSEMBLIES

Adopt sections listed in Express Terms and bring forward existing amendments from the 2022 CRC into the 2025 CRC with modifications in sections listed below.

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| **SFM 09/24 ITEM 6** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **6-1** | ***R902.1.1 Roofing requirements within Fire Hazard …***  **R902.3 Building–integrated photovoltaic (BIPV) systems.** | **Approve** | **Accept** |  | Update reference pointers. |  |

### ITEM 7 CHAPTER 10 CHIMNEYS AND FIREPLACES

Adopt sections listed in Express Terms.

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| **SFM 09/24 ITEM 7** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **7-1** | **Chapter 10** | **Approve** | **Accept** |  | Adopt sections listed in Express Terms. |  |

### ITEM 8 PART IV ENERGY CONSERVATION, CHAPTER 11 [RE] ENERGY EFFICIENCY

SFM does NOT adopt Chapter 11 (Part IV).

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| **SFM 09/24 ITEM 8** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **8-1** | **Chapter 11** | **Approve** | **Accept** |  | SFM does NOT adopt Chapter 11 (Part IV). |  |

### **ITEM 9 PART V MECHANICAL, CHAPTERS 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 AND 23**

SFM does NOT adopt Chapters 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 and 23 (Part V).

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| **SFM 09/24 ITEM 9** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **9-1** | **Chapters 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 and 23** | **Approve** | **Accept** |  | SFM does NOT adopt Chapters 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 and 23 (Part V). |  |

### **ITEM 10 PART VI FUEL GAS, CHAPTER 24 FUEL GAS**

SFM does NOT adopt Chapter 24 (Part VI).

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| **SFM 09/24 ITEM 10** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **10-1** | **Chapter 24** | **Approve** | **Accept** |  | SFM does NOT adopt Chapter 24 (Part VI). |  |

### ITEM 11 PART VII PLUMBING, CHAPTERS 25, 26, 27, 28, 29, 30, 31, 32 AND 33

SFM does NOT adopt Chapters 25, 26, 27, 28, 29, 30, 31, 32 and 33 (Part VII).

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| **SFM 09/24 ITEM 11** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **11-1** | **Chapters 25, 26, 27, 28, 29, 30, 31, 32 and 33** | **Approve** | **Accept** |  | SFM does NOT adopt Chapters 25, 26, 27, 28, 29, 30, 31, 32 and 33 (Part VII). |  |

### ITEM 12 PART VIII ELECTRICAL, CHAPTERS 34, 35, 36, 37, 38, 39, 40, 41, 42 AND 43

SFM does NOT adopt Chapters 34, 35, 36, 37, 38, 39, 40, 41, 42 and 43 (Part VIII).

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| **SFM 09/24 ITEM 12** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **12-1** | **Chapters 34, 35, 36, 37, 38, 39, 40, 41, 42 and 43** | **Approve** | **Accept** |  | SFM does NOT adopt Chapters 34, 35, 36, 37, 38, 39, 40, 41, 42 and 43 (Part VIII). |  |

### ITEM 13 CHAPTER 44 REFERENCED STANDARDS

Adopt Chapter 44 from 2024 IRC and carry forward existing amendments from 2022 CRC into the 2025 CRC with modifications listed below.

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| **SFM 09/24 ITEM 13** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **13-1** | **NFPA 13D-*~~22~~ 25***  **NFPA 13R-*~~22~~ 25***  **NFPA 31—~~20~~ *24***  **NFPA 58~~—23~~ *24***  **NFPA 211~~—22~~ *24***  **NFPA 286—~~23~~ *24*** | **Approve** | **Accept** |  | Revise Referenced Standard edition to align with proposed Code revisions. |  |

### ITEM 14 APPENDICES

SFM proposes adoption or non-adoption of 2024 IRC Appendices as listed below.

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| **SFM 09/24 ITEM 14** | **Code Section** | **CAC Action** | **Agency Response** | **Public Comments** | **Annotations** | **CBSC Action** |
| **14-1** | **Appendices AA, AB, AC (reserved), BA** | **Approve** | **Accept** |  | SFM proposes to NOT adopt. |  |
| **14-2** | **Appendix BB Tiny Houses** | **Approve** | **Accept** |  | SFM proposes to adopt. |  |
| **14-3** | **Appendix BC, BD** | **Approve** | **Accept** |  | SFM proposes to NOT adopt and do not print. |  |
| **14-4** | **Appendix BE** | **Approve** | **Accept** |  | SFM proposes to NOT adopt. |  |
| **14-5** | **Appendix BF Patio Covers** | **Approve** | **Accept** |  | SFM proposes to adopt Section BF 103.2 only. |  |
| **14-6** | **Appendices BG, BH, BI** | **Approve** | **Accept** |  | SFM proposes to NOT adopt. |  |
| **14-7** | **Appendix BJ** **Strawbale Construction** | **Approve** | **Accept** |  | SFM proposes to adopt Section BJ 107 only. |  |
| **14-8** | **Appendix BK** | **Approve** | **Disagree** | Testimony heard at BFO. | SFM proposes to NOT adopt.  Based on public comment during the Building, Fire, and Other Hearings the SFM is proposing to adopt the fire-resistance provisions for Cob Construction. |  |
| **14-9** | **Appendix BL** **Hemp-Lime (Hempcrete) Construction** | **Approve** | **Accept** |  | SFM proposes to adopt Section BL 105 only. |  |
| **14-10** | **Appendices BM, BN** | **Approve** | **Accept** |  | SFM proposes to NOT adopt. |  |
| **14-11** | **Appendix BO Existing Building and Structures** | **Approve** | **Accept** |  | SFM proposes to adopt Sections BO102.4 and BO102.5. |  |
| **14-12** | **Appendices CA, CB, CC, CD, CE, CF, CG, CH and Energy Appendices** | **Approve** | **Accept** |  | SFM proposes to NOT adopt. |  |