

# COALITION REQUESTED FOR CHANGES to COLORADO WILDFIRE RESILIENCY CODE (CWRC)

## SUMMARY

The current Colorado Wildfire Resiliency Code (CWRC) **significantly departs from established national standards**. This would be the **first wildfire resiliency code in the U.S. not aligned with the International Wildland-Urban Interface Code (IWUIC)** or California's Chapter 7A **introducing inconsistencies** in defensible space, structure hardening, and material performance criteria. These inconsistencies undermine proven wildfire mitigation strategies and create challenges for interpretation and implementation.

Our coalition **recommends the following changes to *restore alignment with national best practices***:

- **Harmonize** terminology and classification **with IWUIC**.
- **Reinstate performance-based options** recognized in California's Chapter 7A and IWUIC.
- **Remove exceptions that permit combustible materials** near/on structures.
- **Clarify technical requirements** for ignition-resistant materials and fire-retardant-treated wood.
- **Ensure the CWRC maintains *consistency, safety, and credibility*** in wildfire resiliency efforts.

## PROPOSED CHANGES

Problem/Issue	Proposed Solution	Rationale/Impact
Inconsistency with IWUIC	Add attribution statement noting adaptation from IWUIC.	Clarifies CWRC origin and improves transparency.
Decking Performance	Require ASTM E2632 testing for Class B decking with strict acceptance criteria.	Ensures rigorous fire performance standards.
Section Naming and Structure	Revise section names to use 'WUI Construction Class' terminology.	Creates consistency with IWUIC.
Exterior Wall Performance	Consolidate Section 404.3 to include all performance-based options and exceptions.	Removes duplication and clarifies acceptance criteria.
Exterior Siding Material Exception	Replace exception for vinyl siding with criteria for siding use as part of an approved fire-resistance rated assembly	Recognize exterior wall coverings when used as part of approved one-hour fire-resistance-rated wall assemblies.
Fence Material Exception	Remove exceptions for vinyl fencing.	Eliminates combustible fencing near and abutting structures.
Performance Testing vs. Material Lists	Require ASTM E2632 testing for all decking materials.	Supports innovation and safety.
Technical Requirements for Ignition-Resistant Materials	Update technical requirements to reference latest standards.	Improves clarity and enforceability.



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