



Advisory Bulletin

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2025 COLORADO WILDFIRE RESILIENCY CODE (CWRC)

This document is for reference only and is not intended to replace or fully represent the actual code provisions in the 2025 CWRC. Refer to the 2025 CWRC as published and the local Authority Having Jurisdiction (AHJ) for actual code requirements.

PURPOSE:

This bulletin provides a concise summary of roofing-related requirements and best practices under the Colorado Wildfire Resiliency Code (CWRC) for work performed in Wildland-Urban Interface (WUI) areas.

EFFECTIVE DATE:

- **July 1, 2026:** Enforcement begins for applicable permits

APPLICABILITY

(Reference: CWRC Section 105)

The CWRC applies to:

- New construction and additions greater than 500 square feet
- Re-roofing or exterior work affecting **25% or more of the structure**

WILDFIRE HAZARD CLASSIFICATION

(Reference: CWRC Chapter 3)

Before estimating or contracting work:

- Review current [WUI Maps](#) and determine hazard classification (Low, Moderate, or High).
- Local jurisdictions (AHJ's) and fire districts can adopt more comprehensive maps and additional requirements. The most restrictive building code or ordinance is applicable. Check with the Authority having Jurisdiction (AHJ).
- Confirm requirements with the local Authority Having Jurisdiction (AHJ).
- Coordinate early with both the Building Department and Fire District, as local requirements may exceed minimum CWRC provisions.

This document was prepared by the Colorado Roofing Association and is designed and distributed for informational purposes only. CRA's Building Code & Standards Committee is tasked with representing our members in code, enforcement and inspection issues related to the roofing industry, recommending roofing application best practices to members and municipalities and to facilitate improved communication between the roofing industry and Colorado Building Departments and Code Officials.



STRUCTURE HARDENING

(Reference: CWRC Chapter 4)

Classes of structure hardening:

- **Class 1 structure hardening** is required for all buildings and structures within areas of the wildland-urban interface having a low fire hazard severity.
- **Class 2 structure hardening** is required for all buildings and structures within areas of the wildland-urban interface having a moderate or high fire hazard severity.

Class 1 Structure Hardening

(WUI map areas having a low fire hazard severity)

Class 1 Structure Hardening shall be in accordance with CWRC sections 403.2 through 403.4.2.

- **Roofs shall have a roof covering or roof assembly classified as Class A** when tested in accordance with ASTM E108 or UL 790.
- **For roof systems where there is space between the roof covering and roof deck** (ie tile or those installed on batten systems), requires a Class A roof assembly or one layer of 72-lb cap sheet complying with ASTM D3909. Alternatively fire stopping at the eave may be applied with minimum 26 gauge (19 mil) metal flashing and no openings greater than 1/8 inch if approved by AHJ as meeting the requirement for fire stopping. We recommend contracting a 3rd party contractor for certification of fire stopping.
- **Valley flashing** shall be a minimum of 26 gauge (19 mil) galvanized corrosion-resistant metal installed over a minimum 36-in wide underlayment consisting of one layer of cap sheet complying with ASTM 3909. For single laminate shingle roofs and other roof systems that are typically installed with closed valleys, open metal valleys may be required to prevent leak and adhesion issues affecting the manufacturer's warranty. Consult with the manufacturer to obtain approval, warranty information, and installation details.
- **Gutters and downspouts** shall be constructed of non-combustible material.
- **Ventilation openings** for enclosed attics and rafter spaces shall be covered with non-combustible corrosion resistant mesh with openings not to exceed 1/8". Any other options require evaluation and or testing in accordance with ASTM E2886.
- **Noncombustible material.** Any material conforming to ASTM-E136 shall be considered noncombustible as defined in CWRC.



Class 2 structure hardening

(WUI map areas having a moderate or high fire hazard severity)

Class 2 Structure Hardening shall be in accordance with CWRC sections 403.2 through 404.10.1 and includes the requirements for Class 1 Structure Hardening plus the following.

- **Eaves and soffits** shall be protected on the exposed underside by non-combustable material, ignition resistant material, by materials approved for not less than a 1-hour fire resistance rating, 5/8-inch Type X drywall, 2-inch nominal dimensional lumber, 1 inch nominal fire-retardant-treated wood, or 3/4 inch nominal fire-retardant-treated plywood, identified for exterior use and meeting the requirements of Section 2303.2 of the 2024 International Building Code.
- **Exterior Walls.** Exterior walls of buildings or structures shall be constructed with one of the following methods:
 1. Exterior wall assemblies with a minimum of 1-hour fire-resistance rating on the exterior.
 2. Approved noncombustible materials.
 3. Heavy timber or log wall construction.
 4. Noncombustible materials complying with Section 402.2 on the exterior side.
 5. Fire-retardant treated wood complying with Section 402.3 on the exterior side.
 6. Ignition-resistant materials complying with Section 402.4 on the exterior side. Such material shall extend from the top of the foundation to the underside of the eave or the underside of the roof sheathing.
- **Exterior Wall Coverings.** Exterior wall coverings shall be limited to the following:
 1. Noncombustible materials.
 2. Fire-retardant-treated wood.
 3. Ignition resistant building materials.Exception: Where options 1 or 2 in section 404.3 are used, vinyl siding may be used as an exterior covering.
- **Flashing.** A minimum of 6 inches of metal flashing or noncombustible material applied vertically between the wall sheathing and the exterior cladding shall be installed at the ground, decking, and roof intersections. Combustible sheathing products exposed by the gap created at the base of the exterior walls, posts, or columns must be protected with noncombustible material or ignition-resistant building materials while permitting drainage and moisture control.



RELATED EXTERIOR REQUIREMENTS

(Reference: CWRC Section 404 Class 2 Structure Hardening)

Roofing work **may trigger or be affected by** adjacent system requirements. Check with the local Authority Having Jurisdiction (AHJ) for additional requirements on exteriors when replacing roofs.

- Property owners are responsible to comply with the defensible space and home-hardening requirements within 5 feet of the structure.
- Siding must be noncombustible in moderate/high hazard areas.
- Exterior Glazing: Windows, doors, and skylights may require tempered, fire-rated, or multi-layered glazing.
- Decking must meet ignition-resistant standards.
- Attached fencing must be noncombustible near the structure.

PERMITTING AND DOCUMENTATION

(Reference: CWRC Appendix A)

Check with the AHJ (Authority Having Jurisdiction) for their specific WUI requirements prior to pulling a new permit. You will be subject to the building code adopted by the AHJ along with any local fire district. If the AHJ code requirement is less restrictive than the CWRC the more restrictive building code requirements will apply.

- If you pulled a permit for a project prior to July 1, 2026 you should check with the Authority Having Jurisdiction (AHJ) to ensure that you are not required to meet the new CWRC for that project.
- Maintain documentation supporting code compliance and inspections. The CWRC includes specific requirements for roof deck protection on roofs with a space between the roof deck and roof covering (Section 403.2.1) and for valley flashing (Section 403.2.2). Some commonly used roofing materials and assemblies may not satisfy these requirements. Where UL, ASTM, or equivalent testing or listings are required, verify compliance with the local Authority Having Jurisdiction (AHJ). As a best practice, obtain written confirmation rather than relying solely on verbal guidance.
- Contractors should be prepared to provide:
 - Product approvals;
 - Class A roof assembly documentation (ASTM E108 or UL 790 testing information) when requested;



- Installation specifications;
- Firestop documentation where utilized;
- Photo documentation of critical details;
- Manufacturer installation instructions.
- **Expect increased inspection and enforcement by code officials.**

FIRE DISTRICTS:

With the adoption of the Colorado Wildfire Resiliency Code (CWRC), it remains critical to coordinate with your local fire district before starting a roofing project. While the CWRC establishes statewide minimum standards that are adopted and modified by local jurisdictions (AHJ's), **fire districts continue to have the authority to enforce fire code requirements that may exceed local building codes** and are often involved in review and inspection, particularly in WUI areas. Failing to engage early can lead to costly redesigns, construction delays, failed inspections, or removal of non-compliant work. Early coordination is an essential step to ensure full compliance with all applicable fire safety regulations and to protect the project timeline and investment.

CONTRACTS:

Ensure contract language reflects potential code compliance upgrades (CWRC/roofing) and outlines responsibility for associated costs.

RESOURCES

- **Colorado Wildfire Resiliency Code**
<https://dfpc.colorado.gov/colorado-wildfire-resiliency-code>
- **Download the CWRC**
https://drive.google.com/file/d/1bhSESWE9pei6MMsv52VeGtC_WBgD7bVA/view
- **Adoption & Implementation Resources**
<https://dfpc.colorado.gov/code-adoption-implementation-resources>
- **WUI Mapping Resource / Colorado Forest Atlas**
<https://co-pub.coloradoforestatlas.org/#/>
- **CWRC Education Series**
<https://www.youtube.com/playlist?list=PLTiEsd-MK9K12pgPgPtjxADQYYrCtJOHe>



SUMMARY

The CWRC establishes roofing as part of a broader fire-resistant building system. Compliance requires attention not only to roof coverings, but also to ventilation, edges, and adjacent components. Roofing contractors must plan, price, and execute work with **full system compliance** in mind.