



Date: May 4, 2026

To: Stoyan Bumbalov, Executive Director
California Building Standards Commission
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From: California Building Industry Association California Apartment Association
California Business Properties Association Building Owners & Managers Association

RE: **Support for: Office of the State Fire Marshal 45-Day Express Terms
2025 California Building Code, Title 24, Part 2 (SFM 01-25)**

The trade associations cited above, the Industry Coalition, represent California's residential and non-residential construction and management industries. The Industry Coalition supports the Office of the State Fire Marshal's (SFM) proposed changes listed in Items 1-4 and Items 6-7 in the 45-Day Express Terms (SFM 01-25) for the 2025 California Building Code. The Coalition would also like to provide comment Item 5-1 related to Carbon Monoxide Detection.

Item 5-1: CBC Section 915 – Carbon Monoxide (CO) Detection

This item was discussed at the February 17th BFO-SD/LF Code Advisory Committee (CAC) meeting. The CAC recommended Further Study on this item and suggested the need for the SFM to resolve any potential co-adoption issues that may exist with provisions adopted by the Department of Housing & Community Development (HCD). The SFM accepted the CAC recommendation and subsequently removed sections that were adopted by HCD, and in two cases, renumbered sections adopted by HCD to allow for the inclusion of new sections that the SFM was adding to the code.

However, the new **Section 915.2.4 Interior Spaces With Direct Carbon Monoxide Sources**, includes application language that starts with the phrase, "*In all occupancies, ...*", which would seem to include residential occupancies under the authority of HCD.

Also, in the new **Section 915.2.5 Interior Spaces Adjacent to a Space Containing a Carbon Monoxide Source**, includes the statement, "*Interior spaces that are separated from and adjacent to an enclosed parking garage or an interior space that contains a direct carbon monoxide source shall be provided with carbon monoxide detection if there are communicating openings between the spaces.*" Once again, without further clarification, this statement would seem to include residential occupancies (such as a home with an attached garage) that fall under the authority of HCD.

While the Industry Coalition supports the proposed changes to the carbon monoxide provisions, we respectfully request the Office of the State Fire Marshal to once again work with the Department of Housing & Community Development to ensure that there are no co-adoption issues with the new language being proposed in Sections 915.2.4 and 915.2.5.