



Date: May 5, 2026

To: Stoyan Bumbalov, Executive Director
California Building Standards Commission
stoyan.bumbalov@dgs.ca.gov

From: California Building Industry Association California Apartment Association
California Business Properties Association Building Owners & Managers Association

RE: **Supplemental Comments to May 4, 2026, Industry Coalition Letter Supporting
Office of the State Fire Marshal 45-Day Express Terms
2025 California Building Code, Title 24, Part 2 (SFM 01-25)**

On May 4, 2026, the Industry Coalition filed comments supporting the Office of the State Fire Marshal's 45-Day Express Terms for the 2025 California Building Code, Part 2 (SFM 01-25).

In that letter, the Coalition respectfully requested the SFM to reach out to the Department of Housing & Community Development (HCD) and ensure that there are no co-adoption issues with the new language being proposed in Sections 915.2.4 and 915.2.5 relative to carbon monoxide detection.

It has been brought to our attention that the SFM has discussed this issue thoroughly with HCD and identified no co-adoption issues exist with this SFM submittal. In addition, HCD will be updating their carbon monoxide detection standards during the next Triennial Code Adoption cycle, as allowed under AB 130's exceptions to the six-year pause placed on updates to California's residential building standards.

Given this latest information, the Industry Coalition would like to update our May 4th letter by indicating our concern with the SFM's Carbon Monoxide Detection proposal has been satisfactorily resolved.

Thank you for your consideration.