



May 12, 2026

To: California Building
Standards Commission
State of California Building
Standards Commission

Re: 45-Day Express Terms for Proposed Building Standards of the Office of
State Fire Marshal

Regarding the 2025 California Wildland-Urban Interface Code, California Code
of Regulations, Title 24, Part 7.

Thank you for the opportunity to comment on 2025 California Wildland-Urban
Interface Code, California Code of Regulations, Title 24, Part 7 (SFM 04/25).

Modern Mill Inc is a composite exterior products manufacturer, using
upcycled rice hulls and PVC to create various siding, decking, trim, and other
accessory building materials.

Modern Mill Inc. is submitting public comment to be in consensus with the
Arclin, Roseburg Forest Products, and American Wood council submittals
regarding Sub-Iten 4-2.

From the Arclin submission:

- Section 504.5.2. The provision that requires wall covering to not
reduce the fire performance is unclear. This is too broad and difficult
to implement.

From the American Wood Council submission:

- The last sentence of Section 504.5 should also be deleted because it is
confusing, not necessary, and will likely be misinterpreted. As
currently proposed, it appears to imply that exterior walls containing
any ignition-resistant building materials (even if not necessarily
constructed entirely of ignition-resistant building materials) do not
need to comply with 504.5.2. It could also be interpreted that this
means it does not need to comply with either of the preceding two
options. This sentence is not needed because the language provided
in the initial charging sentence of 504.5 and Items 1 and 2 clearly
outline the allowable compliance paths.



- The last sentence in Section 504.5.2 should be deleted because it conflicts with the charging language of 504.5, which requires compliance with either 504.5.1 or 504.5.2, but not necessarily both. Furthermore, the term “fire performance,” as used in this proposed new sentence, is ambiguous and undefined. It is not clear how compliance with this proposed new sentence would be demonstrated.

From the Roseburg submittal:

- Comment 1: Section 504.5 should expressly preserve approved exterior wall assemblies and their listed wall-covering components.

Thank you for considering our concerns.

Sincerely,

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