



**Via Email**

May 18<sup>th</sup>, 2026  
State of California  
Building Standard Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

**RE: Public comment on 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.**

Dear California Building Standards Commission,

APA – The Engineered Wood Association would like to submit the following comments on the proposed changes in SUB-ITEM 4-8, listed as below. (~~Strikethrough~~/addition).

1. Bracketed instructions or explanation leading Section 504.5 conflicts with the mandatory provisions in Section 504.5. Suggest deletion.

~~[The Exterior wall sections are designed to work together, and compliance is achieved when the exterior wall complies with both the exterior wall construction provisions and the exterior wall covering provisions.]~~

2. There is a perceived conflict between the requirements set forth in Section 5.4.5 and the corresponding discussion in the Initial Statement of Reasons (ISOR) regarding whether the prescriptive pathway is cumulative or selective (i.e., either/or). Such discrepancy would potentially result in inconsistency during plan review and inspection. Suggest rewriting ISOR section 504.5 discussion to clearly reflect that compliance shall be achieved through either 504.5.1 or 5.4.5.2.
3. There is an additional conflict in the last paragraph of section 504.5. Ignition-resistant material is listed in section 504.5.1 as one of the compliance options for qualified exterior wall construction. With the Section 504.5 charging language provides clear pathways, this last paragraph seems redundant. Suggest deletion. ~~Where exterior walls are constructed using ignition-resistant building materials in accordance with section 503.2, an exterior wall covering complying with section 504.5.2 shall not be required.~~



4. Typical fire rated construction can be rated either from one side or both sides. Based on the protection intent and current provisions, it is suggested that exterior definition be put back to the 1-hr rated wall construction requirement.

**1-hour fire-resistance-rated construction** [on the exterior side.](#)

APA appreciate the opportunity to comment.

Sincerely

A handwritten signature in black ink, appearing to read "Eric Gu". The signature is fluid and cursive, with the first name "Eric" being more prominent than the last name "Gu".

Eric Gu, PhD., PE  
Vice President of Technical Services Division  
APA – The Engineered Wood Association

cc: YC, TDS