



www.roseburg.com

3660 Gateway St
Springfield Oregon 97477

Tel: 1-800.245.1115

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Via email: cbsc@dgs.ca.gov

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Roseburg Forest Products Comments on SFM 04/25 - 2025 California Wildland-Urban Interface Code, Title 24, Part 7, Section 504.5 Exterior Walls (Sub-Item 4-8)

Dear Commissioners and Office of the State Fire Marshal Staff:

Roseburg Forest Products Co. ("Roseburg") is a privately held, U.S.-based manufacturer of wood products, including plywood, lumber, engineered wood products, and medium density fiberboard. Roseburg supplies materials used in residential and commercial construction, as well as industrial and specialty applications, and sells exterior siding products into the California market. As a manufacturer of exterior wall siding and sheathing products used in Wildland-Urban Interface (WUI) construction, Roseburg has a direct interest in ensuring that Title 24, Part 7 is clear, enforceable, and preserves tested and approved compliance pathways for safe exterior wall systems.

Roseburg respectfully submits these comments on Sub-Item 4-8, Section 504.5 Exterior walls. Roseburg supports the State Fire Marshal's objective of improving home hardening and reducing wildfire ignition risk. Roseburg is not requesting that the code allow untested combustible siding to be installed over a 1-hour wall assembly. Roseburg's concern is narrower: the proposed language could be interpreted to eliminate or obscure existing performance-based pathways for exterior wall siding and sheathing products that have been tested, approved, and listed for WUI use when installed in accordance with their listings.

Roseburg's WUI-listed exterior siding products

The 2025 Office of the State Fire Marshal (OSFM) WUI Listed Products Handbook (September 2, 2025 edition) lists Roseburg Forest Products Co. products under Category 8140 - Exterior Wall Siding and Sheathing for Wildland-Urban Interface. These listings include, among others:

OSFM listing no.	Roseburg product	Listed design / installation summary
8140-2031:0001	Breckenridge Siding	19/32 in. siding with groove pattern, installed over 15/32 in. CDX plywood, 7/16 in. OSB, or directly to studs, as listed.
8140-2031:0002	Douglas Fir siding	19/32 in. Douglas Fir shiplap siding, installed over 15/32 in. CDX plywood sheathing or directly to studs, as listed.
8140-2031:0003	DuraTemp siding	15/32 in. DuraTemp siding, APA certified, installed over 15/32 in. CDX plywood sheathing, as listed.
8140-2031:0004	DuraTemp siding	19/32 in. primed shiplap siding, APA certified and indicating conformity with PRP-108 and ICC-ES ESR-4856, installed over 1/2 in. plywood, 7/16 in. OSB, or directly to studs, as listed.

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

The proposed Express Terms state that exterior walls shall comply with either Section 504.5.1, Exterior wall construction, or Section 504.5.2, Exterior wall coverings. Section 504.5.1 then includes performance-based wall assembly pathways, including assemblies tested in accordance with ASTM E2707 and SFM Standard 12-7A-1. However, the explanatory bracketed statement preceding Section 504.5 and the Initial Statement of Reasons state that the exterior wall construction and exterior wall covering provisions are designed to work together and that compliance is achieved when both are met. In addition, the proposal deletes the existing Section 504.5.2 exception for exterior wall coverings that are components of an approved wall assembly complying with Section 504.5.

Read together, these provisions could be interpreted by code users and enforcing agencies to require every exterior wall covering to independently satisfy one of the four listed Section 504.5.2 material categories, even when the covering is part of a tested and approved exterior wall assembly under Section 504.5.1. Because Section 504.5.2 does not expressly include exterior wall siding and sheathing products tested or listed under SFM Standard 12-7A-1, this interpretation could unintentionally disqualify existing OSFM Category 8140 WUI-listed exterior siding and sheathing products when installed in accordance with their listings.

Roseburg understands the State Fire Marshal's concern that combustible exterior wall coverings should not be installed over a 1-hour wall assembly in a way that allows fire to spread upward to the eaves or roof. Roseburg's requested clarification would not permit that result. The requested clarification would only preserve exterior wall coverings that are components of wall assemblies tested, approved, and installed in accordance with the

applicable listing, approved report, or manufacturer's installation instructions recognized by that approval.

Comment 2: Add a specific compliance option, or retain and clarify the deleted exception, for wall coverings that are components of tested and approved wall assemblies.

Roseburg respectfully recommends adding a fifth item to Section 504.5.2 as follows:

5. Exterior wall coverings that are components of wall assemblies tested in accordance with ASTM E2707 or SFM Standard 12-7A-1 and meeting the acceptance or performance criteria of Section 504.5.1, where installed in accordance with the approved listing, approved report, and the manufacturer's installation instructions.

Alternatively, Roseburg recommends retaining the existing exception in Section 504.5.2 and revising it as follows:

Exception: Exterior wall coverings that are components of an approved wall assembly complying with Section 504.5.1, Items 5 or 6, shall be permitted when installed in accordance with the approved listing, approved report, and the manufacturer's installation instructions.

Either approach would preserve the State Fire Marshal's intended home-hardening objective while avoiding an unintended conflict with OSFM-listed exterior wall siding and sheathing products. It would also give building officials clear direction that the approval applies to the tested assembly and its listed installation conditions, not to unrestricted use of any combustible wall covering.

Comment 3: Correct references and editorial issues in the proposed text.

- In proposed Section 504.5.1, Item 6, replace "SFM-7A-1" with "SFM Standard 12-7A-1" to match the current code terminology, product listings, and the State Fire Marshal test protocol.
- Revise the bracketed explanatory text and any corresponding statement of reasons to state that Section 504.5 provides alternative pathways and that approved wall assembly pathways remain available when the wall covering is installed as a component of the approved assembly.

Comment 4: The requested clarification is consistent with the rulemaking record and avoids unnecessary economic impact.

The Initial Statement of Reasons states that the CWUIC is founded on principles that do not unnecessarily increase construction costs, do not restrict the use of new materials, products, or methods of construction, and do not give preferential treatment to types or classes of materials, products, or methods of construction. It also identifies work group objectives that

include ensuring regulatory changes remain practical, cost-effective, and science-based, and fostering innovation by allowing new, proven materials and technologies to be readily available in California.

A reading that removes OSFM-listed Category 8140 exterior siding and sheathing products from the available compliance pathways would materially affect manufacturers, distributors, builders, and property owners who rely on those listings. Such a reading would also create an economic and market impact that does not appear to be addressed in the Initial Statement of Reasons. Roseburg's proposed alternative is equally protective because it is limited to tested and approved wall assemblies and their listed components, and it is less burdensome because it preserves existing approved products and compliance documentation.

Requested action

Roseburg respectfully requests that the Commission and the Office of the State Fire Marshal revise Sub-Item 4-8 to clarify that compliance with Section 504.5 may be achieved through an approved exterior wall construction method under Section 504.5.1, including wall assemblies tested in accordance with ASTM E2707 or SFM Standard 12-7A-1 and their listed wall-covering components, or through an exterior wall covering complying with Section 504.5.2. Roseburg further requests that Section 504.5.2 be revised as set forth above to preserve tested and approved exterior wall siding and sheathing pathways while preventing untested combustible wall coverings from being used in a manner inconsistent with the home-hardening intent of the CWUIC.

Sincerely,

Brandon Higgins

Brandon Higgins
Director of Optimization and Technology
Roseburg Forest Products
(541) 679-3311