



Date: May 7, 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 Wildland-Urban Interface Code, Part 7 (SFM 04-25)**

The Industry Coalition supports the adoption of the SFM's proposed changes to the California Wildland-Urban Interface Code, and has the following questions/comments:

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**Item 1-1: Section 1.1.2 Purpose**

**Item 1-2: Section 101.2 Scope**

**Item 1-3 Section 101.3.1 Application**

**Item 1-4 Section 101.5 Additions or Alterations**

**Comment:** As indicated on October 15, 2025, and again on May 6, 2026, the Industry Coalition strongly supports the permanent adoption of the SFM's Emergency Adoption of the application and scoping provisions prompted by SB 63 and the additional changes needed for clarity. We look forward to working with the SFM on continued enhancement of these application and scoping provisions in subsequent rulemakings.

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**Item 3-1: Section 302.1.1 Fire Hazard Severity Zone (FHSZ) Viewer**

**Comment:** The Industry Coalition strongly supports the SFM's response to the CAC suggestion to provide a link to the Fire Hazard Severity Zone viewer. This is a user-friendly offering by the SFM and will go a long way to answering application questions that arise in the field.

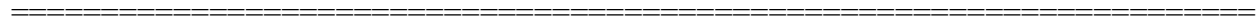
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**4-8: Section 504.5.2 Exterior Wall Coverings.**

**Comment:** While several public comments have indicated that this language may be too vague and give rise to confusion in the field, it has come to our attention that the SFM and key stakeholders have drafted 15-Day Language which addresses many, if not all, of the issues raised by the following commenters:

- Loren Ross (ARCLIN) – Letter dated 4/22/26
- Brandon Higgins (Roseburg Forest Products) – Letter dated 5/1/26

The Industry Coalition agrees with the SFM’s intention to avoid the situation where “*the exterior wall covering would carry the fire upwards to the eaves and roof.*”



**Item 4-10: Section 504.8 Exterior Glazing.**

**Comment:** The Industry Coalition strongly supports the SFM’s response to the CAC’s suggested refinements to the specifications listed in the third alternative in Section 504.8.

