

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE CALIFORNIA BUILDING STANDARDS COMMISSION  
REGARDING THE 2025 CALIFORNIA ADMINISTRATIVE CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 1  
(BSC 01/25)**

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

**STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE and BENEFITS**

Government Code Section 11346.2(b)(1) requires a statement of specific purpose of each adoption, amendment, or repeal and the problem the agency intends to address and the rationale for the determination by the agency that each adoption, amendment, or repeal is reasonably necessary to carry out the purpose and address the problem for which it is proposed. The statement shall enumerate the benefits anticipated from the regulatory action, including the benefits or goals provided in the authorizing statute.

Chapter 1 of the California Administrative Code (Part 1 of Title 24) is reserved to the California Building Standards Commission (CBSC) and contains regulations that explain the various CBSC functions to develop, adopt, and publish building standards in Title 24, California Code of Regulations. It also includes requirements for the state proposing agencies and state adopting agencies involved in the development of building standards.

The proposed amendments to Chapter 1 of the California Administrative Code are being made to clarify, conform, and coordinate requirements related to procedures for compliance with CBSC rulemaking processes. The proposed changes do not materially alter the substance, intent, or regulatory effect of the existing code provisions. Specific rationale is provided for each item.

**ITEM 1**

**Chapter 1 ADMINISTRATIVE REGULATIONS OF THE CALIFORNIA BUILDING STANDARDS COMMISSION, Article 1 GENERAL, Section 1-101 Abbreviations.**

CBSC proposes to add the abbreviations for three new entities – the International Wildland-Urban Interface Code, the California Wildland-Urban Interface Code, and OSHPD 6 to coordinate with other parts of Title 24. This proposal provides consistency within the code.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 2

### Chapter 1, Article 3 APPEALS AND PETITION PROCEDURES, Section 1-313 Petitions.

CBSC proposes adding the option of filing petitions by email as an alternative to regular mail and specifying the appropriate email address to use. Over the past several years, particularly during the pandemic, electronic communication has become much more prevalent. Allowing electronic submission as an alternative to regular mail will simplify and update this process while eliminating waste associated with unnecessary printing and postage.

#### **CAC Recommendation:**

[Enter CAC recommendation(s), if any]

#### **Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 3

### Chapter 1, Article 4 RULEMAKING FOR THE ADOPTION OF BUILDING STANDARDS, Section 1-415 Final rulemaking file by state proposing agencies.

CBSC proposes the following editorial and clarifying changes:

- **Section 1-415(a) #7.**  
Remove “s” in the word “hearings” to correct grammar.
- **Section 1-415(a) #8.**  
Remove the language requiring a transcript of any oral comments received at a public hearing, as those will already be included in the full transcript of the public hearing required in the preceding subitem.
- **Section 1-415(a) #14.**  
Remove the specification of whose signature must be on the Certification of Close and Complete. Instead, only require that it be signed as there are no requirements in the law to have it signed by the agency director or designee.
- **Section 1-415(a) #15.**  
Add language to clarify the State Fire Marshal Approval Letter is to be included as required with the Nine-Point Criteria Analysis to comply with Health and Safety Code Section 18930.
- **Section 1-415(a) #18.**  
Revise referenced item numbers of the individual documents in the list of required documents to reflect the changes from the previous cycle as it was missed during 2024 Triennial Cycle. This proposal is necessary to maintain existing regulations and have correct documents comply with the Web Content Accessibility Guidelines.

#### **CAC Recommendation:**

[Enter CAC recommendation(s), if any]

#### **Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 4

### Chapter 1, Article 4, Section 1-419 Emergency Building Standards.

CBSC proposes to change language requiring wet signatures to accept signatures without distinguishing between wet and digital/electronic signatures for consistency with similar changes made in the previous cycle for other types of rulemaking submittals.

#### **CAC Recommendation:**

[Enter CAC recommendation(s), if any]

#### **Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## **STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS**

Government Code Section 11346.2(b)(1) requires a statement of the reasons why an agency believes any mandates for specific technologies or equipment or prescriptive standards are required.

The proposed amendments to administrative regulations do not mandate any specific technologies or equipment.

## **ASSESSMENT OF EFFECT OF REGULATIONS UPON JOBS AND BUSINESS EXPANSION, ELIMINATION OR CREATION**

Government Code Sections 11346.2(b)(2) and 11346.3(b)(1)

CBSC has assessed whether and to what extent this proposal will affect the following:

#### **A. The creation or elimination of jobs within the State of California.**

These regulations will not affect the creation or cause the elimination of jobs within the State of California.

#### **B. The creation of new businesses or the elimination of existing businesses within the State of California.**

These regulations will not affect the creation of new businesses or elimination of existing businesses within the State of California.

#### **C. The expansion of businesses currently doing business within the State of California.**

These regulations will not affect the expansion of businesses currently doing business within the State of California.

#### **D. The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.**

This proposal will clarify and coordinate existing regulations providing regulatory consistency for the code user. These regulations will not affect the health and welfare of California residents, worker safety and the state's environment as they are editorial in nature.

## **TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS**

Government Code Section 11346.2(b)(3) requires an identification of each technical, theoretical, and empirical study, report, or similar document, if any, upon which the agency relies in proposing the regulation(s).

There are no technical, theoretical, or empirical study, report, or similar documents used as the basis for the proposed amendments to the 2025 California Administrative Code.

## **CONSIDERATION OF REASONABLE ALTERNATIVES**

Government Code Section 11346.2(b)(4)(A) requires a description of reasonable alternatives to the regulation and the agency's reasons for rejecting those alternatives. In the case of a regulation that would mandate the use of specific technologies or equipment or prescribe specific action or procedures, the imposition of performance standards shall be considered as an alternate. It is not the intent of this paragraph to require the agency to artificially construct alternatives or describe unreasonable alternatives.

CBSC has not identified any reasonable alternatives, including less burdensome and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with statute. The proposed CBSC amendments are editorial in nature to provide clarifications to assist the regulated public.

## **REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS**

Government Code Section 11346.2(b)(4)(B) requires a description of any reasonable alternatives that have been identified or that have otherwise been identified and brought to the attention of the agency that would lessen any adverse impact on small business.

No alternatives were identified that would lessen any adverse impact on small business. CBSC has determined that the regulations being proposed are editorial in nature and will not have regulatory effect. Small businesses will not experience an adverse impact due to these amendments.

## **FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE ECONOMIC IMPACT ON BUSINESS**

Government Code Section 11346.2(b)(5)(A) requires the facts, evidence, documents, testimony, or other evidence on which the agency relies to support an initial determination that the action will not have a significant adverse economic impact on business.

CBSC has made an initial determination that this regulatory action would not have a significant adverse economic impact on California business enterprises and individuals, including the ability of California businesses to compete with businesses in other states.

The proposed amendments are clarifying, conforming, or coordinating in nature and do not materially alter the substance or intent of the existing code provisions. The public is welcome to submit any information, facts, or documents either supporting CBSC's initial determination or finding to the contrary.

## **ESTIMATED COST OF COMPLIANCE, ESTIMATED POTENTIAL BENEFITS, AND RELATED ASSUMPTIONS USED FOR BUILDING STANDARDS**

Government Code Section 11346.2(b)(5)(B)(i) states if a proposed regulation is a building standard, the initial statement of reasons shall include the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates.

CBSC has determined that the proposed amendments to Part 1 of Title 24 are editorial in nature and have clarifying, conforming, or coordinating changes that do not materially alter the substance or intent of the existing code provisions. This proposal will clarify and coordinate existing regulations providing regulatory consistency for the code user.

## **DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS**

Government Code Section 11346.2(b)(6) requires a department, board, or commission within the Environmental Protection Agency, the Resources Agency, or the Office of the State Fire Marshal to describe its efforts, in connection with a proposed rulemaking action, to avoid unnecessary duplication or conflicts with federal regulations contained in the Code of Federal Regulations addressing the same issues. These agencies may adopt regulations different from these federal regulations upon a finding of one or more of the following justifications: (A) The differing state regulations are authorized by law and/or (B) The cost of differing state regulations is justified by the benefit to human health, public safety, public welfare, or the environment.

The proposed regulations do not duplicate or conflict with federal regulations. There are no federal regulations addressing this same subject matter.