

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE DIVISION OF THE STATE ARCHITECT  
REGARDING THE 2025 CALIFORNIA BUILDING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2  
(DSA-SS 02/25)**

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.

**ITEM 1**

**Chapter 1 SCOPE AND ADMINISTRATION**

**Section 106.1.2** – DSA is proposing to add clarifying language in response to change made in referenced standard ASCE 7-22. ASCE 7-22 adopted reliability targeted design ground snow loads with a revised load factor and importance factors built into the number based on Risk Category. Simplistically, this resulted in a strength level load provided by the current code, rather than an allowable stress level load. Consequentially, the loads that trigger this section needed further clarification. This proposal is a clarifying update in response to the changes in ASCE 7-22 and therefore is compliant with H&S Code 18942(a)(2)(A).

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 2**

**Chapter 16 STRUCTURAL DESIGN**

**Section 1617.12.12** – DSA is proposing to add language to Exemption Item 2 to clarify that exemption for distribution systems applies for items weighing 5 pounds per foot or less. This is consistent with the design and detailing requirements in Item 8 for Wall-, Roof- or Floor-Hung Equipment. In addition, language is proposed to be added to exemption Items 2 and 3 clarifying that attachments need not be detailed on the plans if meeting the criteria for the exemption. This proposal is a clarifying update to align with current interpretation and facilitate implementation of the existing code requirements.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 3**

**Chapter 16A STRUCTURAL DESIGN**

**Sections 1603A.1.5 and 1603A.1.6** – DSA is proposing to amend the list of items required to be shown on the construction documents. ASCE 7-22 has revised the equations for design of nonstructural components in buildings. The updated equations now require the building's fundamental period to calculate the forces acting on non-structural components. To simplify this process, the non-structural equipment designer should not be responsible for determining the building's period, whether during construction or afterward. Instead, this information should be included in the drawings, as indicated in #17. The engineer of record (EOR) will already have this information when designing the structure, so no additional effort is required. During the review of this list, several other important items were identified that should also be documented for future evaluations or renovations, as well as for peer reviews, plans examiners, and building officials. Section 1603A.1.6 is also updated to satisfy the statutory mandate to write regulations in plain language. This amendment is for clarification only and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**Section 1617A.1.18** – DSA is proposing to add language to Exemption Item 2 to clarify that exemption for distribution systems applies for items weighing 5 pounds per foot or less. This is consistent with the design and detailing requirements in Item 10 for Wall-, Roof- or Floor-Hung Equipment. In addition, language is proposed to be added to exemption items 2 and 3 clarifying that attachments need not be detailed on the plans if meeting the criteria for the exemption. This proposal is a clarifying update to align with current interpretation and facilitate implementation of the existing code requirements.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 4**

**Chapter 17A SPECIAL INSPECTIONS AND TESTS**

**Section 1705A.5.5** – DSA is proposing to remove language regarding “sourcing” of glulams because the procurement method is irrelevant and should not affect Special Inspection (SI) exemptions for standard glulams. Provided the glulams meet the size and span limitations and are non-custom with appropriate markings, SI exemption is allowed. This proposal is a clarifying update to align with current interpretation and facilitate implementation of the existing code requirements.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 5**

**Chapter 21 MASONRY**

**Section 2115.3.2.2** – DSA is proposing to remove the requirement for maintaining a one bar diameter clear distance between reinforcing bars and masonry units which was added in this section by mistake during the 2024 Triennial Code Cycle. In the 2024 cycle rulemaking documents it was mistakenly shown as an existing language and was codified in 2025 CBC as such. The DSA-SS/CC alternative provisions should remain consistent with historical requirements for Community College provisions related to seismic safety requirements only. DSA is proposing to correct this oversight and continue enforcing these existing regulations to maintain the seismic safety requirements and eliminate the added requirement not related to seismic safety. This amendment does not materially alter the intent of existing code provisions or impact the cost of compliance as 2025 CBC code provisions are not enforced as currently written for the alternative provisions.

**Section 2115.3.2.5** – DSA is proposing to remove the requirement for grout cover when placing horizontal reinforcement in bond beam units which was added in this section by mistake during the 2024 Triennial Code Cycle. In the 2024 cycle rulemaking documents it was mistakenly shown as an existing language and was codified in 2025 CBC as such. The DSA-SS/CC alternative provisions should remain consistent with historical requirements for Community College provisions related to seismic safety requirements only. DSA is proposing to correct this oversight and continue enforcing these existing regulations to maintain the seismic safety requirements and eliminate the added requirement not related to seismic safety. This amendment does not materially alter the intent of existing code provisions or impact the cost of compliance as 2025 CBC code provisions are not enforced as currently written for the alternative provisions.

**Section 2115.5.3** – DSA is proposing to remove the sentence requiring an open end type of unit with a maximum vertical reinforcement spacing where other than running bond is used. This requirement was added in this section by mistake during the 2024 Triennial Code Cycle. In the 2024 cycle rulemaking documents it was mistakenly shown as an existing language and was codified in 2025 CBC as such. The DSA-SS/CC alternative provisions should remain consistent with historical requirements for Community College provisions related to seismic safety requirements only. DSA is proposing to correct this oversight and continue enforcing these existing regulations to maintain the seismic safety requirements and eliminate the added requirement not related to seismic safety. This amendment does not materially alter the intent of existing code provisions or impact the cost of compliance as 2025 CBC code provisions are not enforced as currently written for the alternative provisions.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 6**

**Chapter 21A MASONRY**

**Section 2104A.1.3.5 Item 1 and Item 2** – DSA is proposing to remove the redundant language from Items 1 and 2 for grout pours not terminated at or within the top course of constructed masonry since that case is already addressed in Item 3 and does not need to be restated. The sole purpose for Item 1 is to reference Table 7 for maximum grout pour heights, and Item 2 stipulates that the top of all grout pours shall be in the top course of the constructed masonry. Other cases where grout pours are permitted to be placed in lifts are explicitly addressed in Item 3 and do not need to be referenced from Items 1 or 2. Section 2104A.1.3.5 is updated to satisfy the statutory mandate to write regulations in plain language. This amendment is for clarification only and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 7**

**Chapter 22 STEEL**

**2215.2.2 Section D2** – This item has been covered since the AISC 341-16 was adopted by the 2019 CBC, and is also covered in the AISC Design Guide 1, so this amendment is redundant with the requirement in AISC 341 and no longer needed. This update is a technical clarification of existing code requirements, specifically resolving redundancy and inconsistency between this amendment in the California Building Code (CBC) and existing standard in AISC 341 regarding column base design. By removing this section from the CBC, it is clarified that the provisions in AISC 341 govern. This change does not materially alter the substance or intent of existing code provisions or impact the cost of compliance as DSA will continue to enforce provisions of AISC 341 without change.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 8**

**Chapter 22A STEEL**

**2202A.5.2 Section D2** – This item has been covered since the AISC 341-16 was adopted by the 2019 CBC, and is also covered in the AISC Design Guide 1, so this amendment is redundant with the requirement in AISC 341 and no longer needed. This update is a technical clarification of existing code requirements, specifically resolving redundancy and

inconsistency between this amendment in the California Building Code (CBC) and existing standard in AISC 341 regarding column base design. By removing this section from the CBC, it is clarified that the provisions in AISC 341 govern. This change does not materially alter the substance or intent of existing code provisions or impact the cost of compliance as DSA will continue to enforce provisions of AISC 341 without change.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

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

**ITEM 9**

**Chapter 35 REFERENCED STANDARDS**

**ACI 318—19 (22)** – Add reapproved version that includes revisions to Chapter 3 – Referenced Standards to include updated versions of references. Aside from changes to the reference standards ACI 318-19 and ACI 318-19(22) contain identical requirements. This amendment is for clarification only and does not materially alter the intent of existing code provisions or impact the cost of compliance.

**ASCE 41—17:** – Delete referenced standard no longer adopted by DSA. During the 2024 Triennial Code Cycle, ASCE 41-23 was added as the intended reference standard. Referenced standard ASCE 41-17 was erroneously left in, not deleted. Part 10, The California Existing Building Code, correctly references only ASCE 41-23. Leaving ASCE 41-17 as a referenced standard in Part 2 results in a conflict. Conflict will be resolved by this proposed deletion.

**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 do not contain any mandates for specific technologies or equipment or prescriptive standards.

**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)

Division of the State Architect 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.**  
The Division of the State Architect did not identify any amended regulation that would lead to the creation or elimination of jobs.
- B. The creation of new businesses or the elimination of existing businesses within the State of California.**  
The Division of the State Architect did not identify any amended regulation that would lead to creation of new business or elimination of existing businesses within the State of California.
- C. The expansion of businesses currently doing business within the State of California.**  
The Division of the State Architect did not identify any amended regulation that would lead to 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.**  
The benefits of the regulations provide clarity to the California Building Code, thereby benefiting the welfare of residents, worker safety, and the state's environment.

## **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 formal studies, reports, or documents to be identified as the basis for the proposed amendments.

## **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.

DSA did not identify nor determine any reasonable alternatives to these regulations.

## **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.

There will be no adverse impact on small business.

## **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.

The regulations proposed will have no overall cost impact on business, since they are equivalent to current requirements in the Code.

## **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.

The proposed changes to the regulations are editorial to provide clarity, and do not result in an increase to the cost of compliance in the application and implementation of the California Building Code, since they are equivalent to current requirements.

## **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.

These regulations do not duplicate or conflict with federal regulations.