

**NOTICE OF PROPOSED ACTION  
TO BUILDING STANDARDS OF THE  
DIVISION OF THE STATE ARCHITECT  
REGARDING THE 2025 CALIFORNIA ADMINISTRATIVE CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 1  
(DSA-SS 01/25)**

Notice is hereby given that the California Building Standards Commission (CBSC) on behalf of the Division of the State Architect (DSA) proposes to adopt, approve, codify, and publish changes to building standards contained in the California Code of Regulations (CCR), Title 24, Part 1. The DSA is proposing building standards related to structural design and construction oversight of public elementary and secondary schools, community colleges and state-owned or state leased essential services buildings.

**PUBLIC COMMENT PERIOD**

Reference: Government Code Sections 11346.5(a)(1), 11346.5(a)(15) and 11346.5(a)(17).

A public hearing has not been scheduled; however, written comments will be accepted from **April 3, 2026**, until midnight on **May 18, 2026**.

Comments may be submitted to CBSC via:

Email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)

US Mail postmarked no later than **May 18, 2026**:

California Building Standards Commission  
Attention: Public Comments  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

All written comments received are considered part of the public record and will be made available for public inspection via [CBSC's website](#). Public comments may include personally identifiable information (PII) such as name, email address or mailing address. Interested persons are not required to submit their PII to comment on this rulemaking. However, any PII submitted is subject to posting on the publicly accessible [CBSC website](#) without redaction. Also, only comments received in an accessible format will be viewable on CBSC's website. Non-accessible comments will be listed on the website and made available upon request. Any interested person, or his or her duly authorized representative, may request no later than 15 days prior to the close of the written comment period that a public hearing be held.

The public will have an opportunity to provide written and oral comments regarding the proposed action on building standards at a public meeting to be conducted by CBSC to be scheduled at a date near the end of the current adoption cycle. A meeting notice will be issued announcing the date, time and location of the public meeting.

**POST-HEARING MODIFICATIONS TO THE TEXT OF THE REGULATIONS**

Reference: Government Code Section 11346.5(a)(18).

Following the public comment period, CBSC may adopt the proposed building standards substantially as proposed in this notice or with modifications that are sufficiently related to the original proposed text and notice of proposed changes. If modifications are made, the full text of the proposed modifications, clearly indicated, will be made available to the

public for at least 15 days prior to the date on which CBSC adopts, amends, or repeals the regulation(s). CBSC will accept written comments on the modified building standards during the 15-day period.

NOTE: To be notified of any modifications, you must submit written/oral comments or request that you be notified of any modifications.

## **AUTHORITY AND REFERENCE**

Reference: Government Code Section 11346.5(a)(2).

CBSC proposes to adopt these building standards under the authority granted by Health and Safety Code Section 18949.1. The purpose of these building standards is to implement, interpret, or make specific the provisions of Health and Safety Code Sections 13138, 16022, 18909; Government Code Sections 4454 and 14963; and Education Code Sections 17070.54, 17300, 17301 and 81133.

The Division of the State Architect is proposing this regulatory action based on Health and Safety Code Section 16022, Education Code Sections 17300, 17301, 17310, 81133 and 81142, and Government Code Sections 4453 and 14963.

## **INFORMATIVE DIGEST**

Reference: Government Code Section 11346.5(a)(3).

### **Summary of Existing Laws**

**Health and Safety Code Section 13138** authorizes the State Fire Marshal (or agency appropriated responsibility for enforcement) to charge an amount sufficient to recover costs incurred for building code inspections and related fire and life safety activities (such as plan review).

**Health and Safety Code Section 16022** assigns the State Architect the responsibility to observe the implementation and administration of the Essential Services Act, to establish and adopt regulations deemed necessary to do so, to provide advice and assistance to local jurisdictions and to hear appeals relative to administration of the Act.

**Health and Safety Code Section 18949.1**, transfers the responsibilities of DSA to adopt regulations relating to building standards, to the California Building Standards Commission.

**Health and Safety Code Section 18909** defines what is and is not a building standard.

**Government Code Section 4453** assigns responsibility for enforcement of Chapter 7 to the Director of the Department of General Services (DGS) where state funds are used for any project or where funds of counties, municipalities, or other political subdivisions are utilized for the construction of elementary, secondary, or community college projects.

**Government Code Section 4454** dictates that no contract shall be awarded until DGS has issued written approval stating that the plans and specifications comply with the intent of Chapter 7, and Government Code Section 4454.5 declares district faculty and employee housing, and community college student housing buildings exempt from the requirement for written approval from DGS.

**Government Code Section 14963** transfers the responsibilities of the State Fire Marshal to conduct duties and functions related to construction, school, plan checking, and construction inspection to DSA.

**Education Code Section 17070.54** requires school districts to submit to DGS, a five-year school facilities master plan, or updated five-year school facilities master plan, as a condition of receiving construction funding from the School Facilities Program. **Section 17070.54(d)** stipulates that DGS, *“...in consultation with the State Department of Education, shall develop guidelines that school districts may use to guide the development of the school facilities master plan required as a condition of participating in the school facilities program. The department, in consultation with the State Department of Education, shall develop guidelines or standards that school districts shall use to develop and submit the inventory required...for every school in the school district...”*

**Education Code Sections 17280-17317 and 81130-81149** are known and cited as the “Field Act”. The Field Act was enacted after the 1933 Long Beach Earthquake and assigned DSA authority for design review and construction oversight of school building construction in California to ensure the protection of life and property.

**Sections 17310 and 81142** authorize the State Architect to establish building standards for public elementary and secondary schools, and community colleges.

**Education Code Sections 17300, 17301, 81133** establish rules related to filing fees for projects.

## Summary of Existing Regulations

Existing building standards which prescribe the administrative requirements for building design and construction of state-owned or state-leased essential services buildings, public elementary and secondary schools, and community colleges are promulgated by the Division of the State Architect. These regulations are contained in CCR, Title 24, Part 1, and are based on authority and responsibilities assigned to DSA by statute.

## Summary of Effect

The proposed action amends the current 2025 edition of the California Administrative Code (CAC) (Title 24, Part 1, California Code of Regulations). In addition to the item noted below, the proposed action contains editorial updates, including clarifications as necessary to implement the requirements of EDC 17070.54.

The proposal includes a new requirement to provide a site plan with unique building numbers when submitting a project for DSA review. This will facilitate a more efficient process and coordination between DSA, CDE and OPSC in the review, approval, and funding of school construction projects in accordance with the requirements established by Proposition 2 (AB 247, Chapter 81, 2023-2024). Therefore, this proposal is necessary to facilitate the incorporation and implementation of AB247 (Education Finance: school facilities: Kindergarten Through Grade 12 Schools and Local Community College Public Education Facilities Modernization, Repair and Safety Bond Act of 2024).

## Comparable Federal Statute or Regulations

There are no comparable federal regulations or statutes.

## Policy Statement Overview

The broad objective of the proposed action is to maintain building regulations in conformance with current state law by amending the current edition of the California Administrative Code.

## Evaluation of Consistency

There are no regulations being proposed that will be inconsistent or incompatible within this submittal and with current California Administrative Code and statutory requirements of the Education Code, Government Code, and Health and Safety Code.

## OTHER MATTERS PRESCRIBED BY STATUTE APPLICABLE TO THE AGENCY OR TO ANY SPECIFIC REGULATION OR CLASS OF REGULATIONS

Reference: Government Code Section 11346.5(a)(4).

DSA has determined that there are no other matters prescribed by statute applicable to the agency or to any specific regulation or class of regulations.

## MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS

Reference: Government Code Section 11346.5(a)(5).

DSA has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts, except for ITEM 2, which includes a new requirement to provide a site plan with unique building numbers when submitting a project for DSA review.

## ESTIMATE OF COST OR SAVINGS

Reference: Government Code Section 11346.5(a)(6).

An estimate, prepared in accordance with instructions adopted by Department of Finance, of cost or savings to any state agency, local agency, or school district.

- A. Cost or Savings to any state agency: **NO**
- B. Cost to any local agency required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **NO**
- C. Cost to any school district required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4: **NO**
- D. Other nondiscretionary cost or savings imposed on local agencies: **NO**
- E. Cost or savings in federal funding to the state: **NO**

Estimate: The proposed regulations will have no mandated cost or savings to any state agency, local agency, or school district.

## INITIAL DETERMINATION OF NO SIGNIFICANT STATEWIDE ADVERSE ECONOMIC IMPACT ON BUSINESSES

Reference: Government Code Section 11346.5(a)(8).

If the agency makes an initial determination that the adoption/amendment/repeal of this regulation will not have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, it shall make a declaration to that effect.

DSA has made an initial determination that the adoption of the proposed amendments to this regulation will not have a significant statewide adverse economic impact on businesses, including the ability of California businesses to compete with businesses in other states.

### **Declaration of Evidence**

Reference: Government Code Section 11346.5(a)(8).

In making the declaration, the agency shall provide in the record of facts, evidence, documents, testimony, or other evidence that the agency relied upon to support its initial determination of no effect.

DSA has not relied on any other facts, evidence, documents, testimony, or other evidence to make its initial determination of no statewide adverse economic impact. The scope of the proposed action is to make editorial and clarifying modifications to the existing code that are in alignment with statutory requirements and national referenced standards.

### **COST IMPACT ON REPRESENTATIVE PRIVATE PERSON OR BUSINESS**

Reference: Government Code Section 11346.5(a)(9).

Describe all cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action. If no cost impact, provide the following statement:

DSA is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

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

Reference: Government Code Section 11346.5(a)(10).

The 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 within the State of California.

**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 the creation of new businesses or the 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.**

Part 1, California Administrative Code is the administrative regulations for application of the California Building code, implementation of construction testing and inspection programs, and certification of construction for the safety and protection of life and property of public K-14 school buildings in compliance with the California Education Code and state-owned or state-leased essential service buildings in compliance with the California Health and Safety Code. The benefits of the regulations provide clarity to the California Administrative Code.

**FINDING OF NECESSITY FOR THE PUBLIC'S HEALTH, SAFETY, OR WELFARE**

Reference: Government Code Section 11346.5(a)(11).

Any regulation that requires a report shall not apply to businesses, unless the agency makes a finding that it is necessary for the health, safety, or welfare of the public that the regulations apply to businesses.

N/A

**ESTIMATED COST OF COMPLIANCE OF STANDARDS THAT WOULD IMPACT HOUSING**

Reference: Government Code Section 11346.5(a)(12).

DSA has determined that this proposed action has no effect on housing.

**CONSIDERATION OF ALTERNATIVES**

Reference: Government Code Section 11346.5(a)(13).

DSA has determined that no reasonable alternative considered by DSA or that has otherwise been identified and brought to the attention of DSA would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed action. In addition, no reasonable alternative considered by DSA or that has otherwise been identified and brought to the attention of DSA would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

**AVAILABILITY OF RULEMAKING DOCUMENTS**

Reference: Government Code Sections 11346.5(a)(16) and 11346.5(a)(20).

All of the information upon which the proposed regulations are based is contained in the rulemaking file, which is available for public review, by contacting the person named below. This notice, the express terms and initial statement of reasons can be accessed from the [CBSC website](https://www.dgs.ca.gov/BSC): [dgs.ca.gov/BSC](https://www.dgs.ca.gov/BSC).

Reference: Government Code Section 11346.5(a)(19).

Interested parties may obtain a copy of the final statement of reasons, once it has been prepared, by making a written request to the contact person named below or at the [CBSC website](https://www.dgs.ca.gov/en/BSC): <https://www.dgs.ca.gov/en/BSC>.

Reference: Government Code Section 11346.5(a)(21).

DSA shall provide, upon request, a description of proposed changes included in the proposed action, in the manner provided by Section 11346.6, to accommodate a person with a visual or other disability for which effective communication is required under state or federal law. The statement shall note that providing the accessible description of proposed changes may require extending the period of public comment for the proposed action.

### **CBSC CONTACT PERSON FOR PROCEDURAL AND ADMINISTRATIVE QUESTIONS**

Reference: Government Code Section 11346.5(a)(14).

General questions regarding procedural and administrative issues should be addressed to:

Kevin Day, Deputy Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833  
Telephone: (916) 263-0916

### **PROPOSING STATE AGENCY CONTACT PERSON FOR SUBSTANTIVE OR TECHNICAL QUESTIONS ON THE PROPOSED CHANGES TO BUILDING STANDARDS**

Specific questions regarding the substantive or technical aspects of the proposed changes to the building standards should be addressed to:

Primary Contact:

Diane Gould  
Principal Structural Engineer  
Division of the State Architect  
916-324-6959  
[Diane.Gould@dgs.ca.gov](mailto:Diane.Gould@dgs.ca.gov)

Back up Contact:

Ryan Turner  
Supervising Structural Engineer  
Division of the State Architect  
858-674-5431  
[ryan.turner@dgs.ca.gov](mailto:ryan.turner@dgs.ca.gov)