

**INITIAL STATEMENT OF REASONS
FOR
PROPOSED BUILDING STANDARDS
OF THE
DIVISION OF THE STATE ARCHITECT - STRUCTURAL SAFETY (DSA-SS AND DSA-SS/CC)

REGARDING PROPOSED CHANGES TO
CALIFORNIA MECHANICAL CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 4**

[Note to agencies: Directions below which, like this note, are not intended to be shown in your submittal, have been updated to reflect requirements of AB 1711 (Chapter 779, Statutes of 2014) effective January 1, 2015. New directions are shown in underline.]

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 the agency intends to address 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 - ADMINISTRATION

Section 1.1.1 – Editorial change to correspond with current code cycle.

Section 1.9.2 - Editorial change to maintain consistency between Parts 4 & 5 of Title 24.

Section 1.9.2.1 – Editorial change to maintain consistency between Parts 4 & 5 of Title 24.

Section 1.9.2.1.1 – Editorial change to maintain consistency between Parts 4 & 5 of Title 24.

Section 1.9.2.2 – Editorial change to maintain consistency between Parts 4 & 5 of Title 24.

Section 1.9.2.2.1 – Editorial change to maintain consistency between Parts 4 & 5 of Title 24.

CHAPTER 3 – GENERAL REQUIREMENTS

Section 312.1 - Editorial correction.

CHAPTER 5 - EXHAUST SYSTEMS

Section 513.2.2 - Exceptions - Editorial correction.

Subsection (2) – Editorial correction.

CHAPTER 17 – REFERENCED STANDARDS

Table 1701.2 – DSA is adopting this new Table added to 2018 UMC (Model Code).

TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS:

2018 UMC: Uniform Mechanical Code

STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS:

Health and Safety Code (H&SC) Section 18941 requires consistency with state and nationally recognized standards for building construction in view of the use and occupancy of each structure to preserve and protect the public health and safety.

CONSIDERATION OF REASONABLE ALTERNATIVES:

The alternative to these proposed regulations would be to leave regulations as they are which will be inconsistent with H&SC 18941 requirements.

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

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

FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE IMPACT ON BUSINESS.

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

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

The Division of the State Architect (DSA) has assessed whether or not and to what extent this proposal will affect the following:

- The creation or elimination of jobs within the State of California.
There will be no positive or adverse impact.
- The creation of new businesses or the elimination of existing businesses within the State of California.
There will be no positive or adverse impact.
- The expansion of businesses currently doing business with the State of California.
There will be no positive or adverse impact.
- The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.
There will be no positive or adverse impact.

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

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

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS.

The regulations proposed do not duplicate or conflict with federal regulations.