

**PUBLIC COMMENT on PROPOSED BUILDING STANDARDS**  
For Publication in Title 24, California Code of Regulations

**Instructions**

1. Use of this form is optional. Its use will help the California Building Standards Commission (CBSC) and other state proposing agencies to correctly administer your comments.
2. For matters to be considered by a CBSC Code Advisory Committee (CAC), written comments should be received in the CBSC office 7 days before the scheduled CAC meeting to help ensure CAC consideration.
3. For matters subject to a 45-day or 15-day Public Comment period announced by a Notice of Proposed Action (NOPA), written comments must be received on or before the close of the comment period identified in the NOPA available at CBSC website <http://www.bsc.ca.gov/>. Written and oral comments may be provided at the CBSC public meeting to consider the proposed building standards.
4. Separate comment submittals are necessary for CAC and Public Comment periods. Separate comment forms are necessary for each state agency proposal.
5. This form is available in Fill-and-Print format at CBSC website <http://www.bsc.ca.gov/>. Otherwise print the form, type or complete by hand and attach additional sheets if necessary.
6. Submit comments to the CBSC, 2525 Natomas Park Drive, Suite 130, Sacramento, CA 95833-2936, or by Email at [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov). Please do not FAX comments.
7. For assistance, call the CBSC at (916) 263-0916, or Email CBSC at [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov).

**Commenter Identification and Contact Information**

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**Proposed Building Standard Identification**

Title 24 Part No. (circle one) 1 2 2.5 3 4 5 6 8 9 10 11 12 Section No. \_\_\_\_\_

Proposing State Agency BSC

The proposed building standards is:  Before a CAC  In a 45-day Comment Period  
(check one)  In a 15-day Comment Period.

Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the reverse side is: (check one)

Approve  Disapprove  Further Study Required  Approve as Amended

**Comment/Suggestion on Title 24 Proposed Building Standard:**

Criteria 7

In light of recent publication of the ICC model codes for IBC and IEBC (2018 edition), BSC finds that it is beneficial to align the language of the emergency provisions to be consistent with the published model code provisions. The emergency regulations were largely modeled upon the draft text of the model codes; the original Finding of Emergency includes information in this regard, under the heading of "Background". BSC recommends that the certified building standards become consistent with published final language of the model codes.

**Identification of Attachments**

Check if you have attached additional pages.

The number of pages attached:

**For CBSC Office Use Only:** Date Received:

Rulemaking Item #

Health and Safety Code Section 18930(a) reads:

(a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:

- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
- (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
- (3) The public interest requires the adoption of the building standards. The public interest includes, but is not limited to, health and safety, resource efficiency, fire safety, seismic safety, building and building system performance, and consistency with environmental, public health, and accessibility statutes and regulations.
- (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
- (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
- (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
- (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
  - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
  - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
- (8) The format of the proposed building standards is consistent with that adopted by the commission.
- (9) The proposed building standard, if it promotes fire and panic safety, as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.