FINAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS OF THE
DIVISION OF THE STATE ARCHITECT – STRUCTURAL SAFETY (DSA-SS AND
DSA-SS/CC)
REGARDING THE 2019 CALIFORNIA REFERENCED STANDARDS CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 12
(DSA 06/18)

The Administrative Procedure Act requires that every agency shall maintain a file of
each rulemaking that shall be deemed to be the record for that rulemaking proceeding.
The rulemaking file shall include a Final Statement of Reasons. The Final Statement of
Reasons shall be available to the public upon request when rulemaking action is being
undertaken. The following are the reasons for proposing this particular rulemaking
action:

UPDATES TO THE INITIAL STATEMENT OF REASONS:
Government Code Section 11346.9(a)(1) requires an update of the information
contained in the Initial Statement of Reasons. If the update identifies any data or any
technical, theoretical or empirical study, report, or similar document on which the state
agency is relying that was not identified in the Initial Statement of Reasons, the state
agency shall comply with Government Code Section 11347.1.

There are no revisions to the Initial Statement of Reasons. DSA did not receive public
comments during the 45-Day comment period.

MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS
Pursuant to Government Code Section 11346.9(a)(2), if the determination as to whether
the proposed action would impose a mandate, the agency shall state whether the
mandate is reimbursable pursuant to Part 7 of Division 4. If the agency finds that the
mandate is not reimbursable, it shall state the reasons for the finding(s).

The Division of the State Architect has determined that the proposed regulatory action
WOULD NOT impose a mandate on local agencies or school districts.

OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED
REGULATION(S).
Government Code Section 11346.9(a)(3) requires a summary of EACH objection or
recommendation regarding the specific adoption, amendment, or repeal proposed, and
an explanation of how the proposed action was changed to accommodate each
objection or recommendation, or the reasons for making no change. This requirement
applies only to objections or recommendations specifically directed at the agency’s
proposed action or to the procedures followed by the agency in proposing or adopting
the action, or reasons for making no change. Irrelevant or repetitive comments may be
aggregated and summarized as a group.
DSA did not receive any objections or recommendations regarding the proposed regulations.

**DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS**

Government Code Section 11346.9(a)(4) requires a determination with supporting information that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed, or would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

The Division of the State Architect has determined that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed, would be as effective and less burdensome to affected private persons than the adopted regulations, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

**REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:**

Government Code Section 11346.9(a)(5) requires an explanation setting forth the reasons for rejecting any proposed alternatives that would lessen the adverse economic impact on small businesses, including the benefits of the proposed regulation per 11346.5(a)(3).

The Division of the State Architect did not receive or reject any proposed alternatives that would lessen adverse economic impact on small business