

**INITIAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS
OF THE DIVISION OF THE STATE ARCHITECT
REGARDING THE 2025 CALIFORNIA GREEN BUILDING STANDARDS CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 11
(DSA-SS 03/24)**

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.

General purpose, problem, rationale, and benefits: The Division of the State Architect (DSA) proposes to carry forward existing adopted sections of the 2022 California Green Building Standards Code and amendments included herein for inclusion in the 2025 California Green Building Standards Code, effective January 1, 2026.

ITEM 1

**Chapter 5, NONRESIDENTIAL MANDATORY MEASURES, Division 5.5,
ENVIRONMENTAL QUALITY, Section 5.303, INDOOR WATER USE**

DSA is proposing to amend Section 5.503.4.6 Pre-rinse spray valves to repeal references to *California Code of Regulations, Title 20 (Appliance Efficiency Regulations)* and amend the section to add "Commercial Pre-Rinse Spray Valves". A new reference to the *California Plumbing Code, Section 420.3* is being added. This change is necessary to align with 2024 *Uniform Plumbing Code* adopted standards for pre-rinse spray valves and California adopts the same standards by reference. A reference to Title 20 is no longer needed as model codes include Title 20 requirements for this section. The proposed changes provide the proper reference based on recent model plumbing code updates. This amendment has been coordinated with the Energy Commission, BSC and HCD with no change in regulatory effect.

CAC Recommendation:

[Enter CAC recommendation(s)]

Agency Response:

[agency's response(s)]

ITEM 2

**Chapter 5, NONRESIDENTIAL MANDATORY MEASURES, Division 5.5,
ENVIRONMENTAL QUALITY, Section 5.506, INDOOR AIR QUALITY**

Section 5.506.3 Carbon dioxide (CO₂) monitoring in classrooms.

DSA is amending existing language to clarify and bring this section in line with statute.

DSA is amending language that links to the California Energy Code Table 120.1-A that defines various classroom spaces and which prescribes minimum ventilation rates. The table does not prescribe CO2 levels. Variations in occupancy categories listed in Table 120.1-A such as Classroom (ages 5-8), Classroom (ages 9-18), Art classroom, lecture hall etc. have no effect on the requirement to include CO2 sensors in classrooms. The distinctions made in Table 120.1-A are extraneous and unnecessary and serve to reduce clarity of the regulations. The proposed language is based upon the definition found in the Cambridge Dictionary: "A room in a school or college where groups of students are taught."

DSA is also clarifying language that a standalone sensor only needs to record the highest reading in the space. This proposed amendment will align with the requirements of Assembly Bill 841 (Ting), (Chapter 372, Statutes of 2020).

CAC Recommendation:

[Enter CAC recommendation(s)]

Agency Response:

[agency's response(s)]

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).

No technical, theoretical, or empirical studies or reports were used.

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.

No new prescriptive standards are proposed.

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-SS has not identified any reasonable alternatives to the proposed action, and no adverse impact to small business due to these proposed changes is expected.

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.

DSA-SS has not identified any reasonable alternatives to the proposed action, and no adverse impact to small business due to these proposed changes is expected.

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.

DSA-SS has no facts, evidence, documents, testimony, or other evidence indicating any potential significant adverse impact on business with regard to the proposed action.

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)

DSA-SS 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.

These regulations will not affect 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.

These regulations will not affect the creation or elimination of existing businesses within the State of California.

C. The expansion of businesses currently doing business within the State of California.

These regulations will not affect 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.

This regulation will bring regulations into alignment with the California Schools Healthy Air, Plumbing and efficiency program (AB841 (Chapter 372, Statutes of 2020), clarify regulations thereby support the health and welfare of California residents, worker safety and the states environment.

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 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

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.

The proposed regulations do not conflict with federal regulations.