

**FINAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS
OF THE CALIFORNIA BUILDING STANDARDS COMMISSION
REGARDING THE 2025 CALIFORNIA BUILDING CODE,
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2
(BSC 05/24)**

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.

The California Building Standards Commission (BSC) has not added any data (including technical, theoretical, or empirical studies, reports, or similar documents relied upon) that would necessitate an update of the information contained in the Initial Statement of Reasons.

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).

BSC has determined that the proposed regulatory action WOULD NOT impose a mandate on local agencies or school districts.

BSC does not have authority to adopt regulations applicable to school districts. HSC Section 18928 requires adoption of the most recent edition of the applicable model codes. HSC Section 18938(b) makes building standards contained in the model codes, as adopted by reference into the California Building Standards Code, applicable to all occupancies throughout the State of California as prescribed.

The proposed amendments make clarifying changes to existing code language and have no intended change in regulatory effect. BSC's amendments apply to elements of state buildings, state colleges, and universities only or resolve conflicts with existing California laws or regulations pursuant to HSC Section 18931.

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.

The text with proposed changes was made available to the public for a 45-day comment period from September 6, until October 21, 2024. Three (3) comments were received during the 45-day public comment period. The comments were not specific to BSC's proposed amendments. There was no subsequent public comment period.

ITEM 10

Chapter 16 STRUCTURAL DESIGN

BSC proposes to adopt Chapter 16 of the 2024 IBC and bring forward existing amendments in Sections 1613.1.2 and 1613.1.3 from 2022 CBC to 2025 CBC without change. BSC also proposes to add a Note to Section 1607.12.4.

The three (3) received comments are summarized below and address Section 1608.2 that BSC proposes to continue adopting without amendments.

Commenter(s) and Recommendation:

C. E. Ochoa, California Building Industry Association (with several signatories)

The commenter requests one of the following actions for Section 1608.2 Ground snow loads:

- Further Study Required based on Criteria 3, 4, 5, and 7 allowing the existing Section 1608.2 from the 2021 IBC to remain in effect.
- Amend Section 1608.2 adding a USER NOTE that would indicate site-specific case studies are allowed, provided the local building official approves them.
- Collaborate with the California Building Officials on an Information Bulletin indicating the use of site-specific case studies is allowed, provided the local building official approval.

Commenter(s) and Recommendation:

M. Carney and J. Glicker, REICKER, PFAU, PYLE & McROY LLP

The commenter requests the Commission to confirm that upon its adoption of CBC Section 1608.2, local building officials will maintain their authority to conduct site-specific Case Studies to determine GSL (Ground Snow Loads) requirements in California's Mountain Communities.

Commenter(s) and Recommendation:

J. Rice, Stantec Consulting Services, Inc.

The commenter requests one of the following actions:

- Further Study Required, allowing the existing Section 1608.2 from 2021 IBC to remain in effect.
- Continue to allow local jurisdictions and California Building Officials to use regional case studies at their discretion for determination of design ground snow loads. The commenter suggests clarifying that stipulation with a California Note within the code section, or through an Information Bulletin.

Agency Response to all three (3) comments:

BSC acknowledges the comments regarding the use of the ASCE 7 hazard tool in determining design snow loads, proposed for adoption by reference from the 2024 International Building Code (IBC) into the 2025 California Building Code (CBC). BSC is proposing no further changes to the Express Terms for the 2025 CBC in response to the comment.

California Health and Safety Code (HSC) Section 18928 requires BSC to adopt the most recent edition of the model code (2024 IBC). HSC 18938 provides that building standards contained in the model codes, as referenced in the California Building Standards Code, Title 24, shall apply to all occupancies throughout the state. BSC's authority to propose amendments to the model code or the associated referenced standard is limited as, per HSC 18934.5, BSC amendments are applicable to State buildings and buildings constructed by the University of California and California State Universities only. BSC recommends that the commenters direct related comments to the International Code Council (ICC) to seek clarification or to propose changes to model code to address concerns.

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.

BSC has determined that no alternative considered would be more effective in carrying out the purpose for which the regulations is proposed or would be as effective and less burdensome to affected private person 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).

Not applicable— BSC has determined that this regulatory action would not have a significant adverse economic impact on California business enterprises and individuals, including the ability of California businesses to compete with businesses in other states. BSC is making editorial amendments with no intended change in regulatory effect. The amendments are to provide clarifications and eliminate conflicts with existing building standards.