

**FINAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE DIVISION OF THE STATE ARCHITECT (DSA-SS, DSA-SS/CC)  
REGARDING THE 2025 CALIFORNIA BUILDING CODE,  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2  
(DSA-SS 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 Division of the State Architect (DSA) 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).

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.

The text with proposed changes was made available to the public for a 45-day comment period from September 6, 2024, until October 21, 2024. There was a subsequent 15-Day Comment Period from November 6, 2024, until November 21, 2024.

DSA received one (1) comment during the 45-day public comment period from Bryan Stanley, Technical Services Information Bureau. DSA received two (2) comments during the 15-day public comment period from Bryan Stanley, Technical Services Information Bureau, and Matthew Gross, Youngdahl Consulting Group, Inc. as follows:

## COMMENTS RECEIVED DURING THE 45-DAY COMMENT PERIOD

### ITEM 19

#### Chapter 25 GYPSUM PANEL PRODUCTS AND PLASTER

##### Commenter(s) and Recommendation:

**Section 2507.3.** Bryan Stanley, Technical Services Information Bureau, recommends amending Section 2507.3 Lath attachment to horizontal wood supports. Mr. Stanley states that No. 9 W&M gage minimum screws are not available. He also recommends removing the screw length and points to ASTM C1063.

##### Agency Response:

In response to the comment, DSA coordinated with the Department of Health Care Access and Information (HCAI), amended Section 2507.3 and conducted a 15-day comment period.

## COMMENTS RECEIVED DURING THE 15-DAY COMMENT PERIOD

### ITEM 19

#### Chapter 25 GYPSUM PANEL PRODUCTS AND PLASTER

##### Commenter(s) and Recommendation:

**Section 2507.3.** Bryan Stanley, Technical Services Information Bureau, recommends amending Section 2507.3. Lath attachment to horizontal wood supports. Mr. Stanley states that No. 8 wood screws in accordance with ANSI B18.6.1 should be more consistent with the building code that references ASTM C1861 for lath. He also recommends removing the 1-inch diameter washer when a No. 8 wood screw is used and recommends clarification of the placement for earthquake staples in the next code cycle.

##### Agency Response:

Upon further review, DSA coordinated with HCAI and has decided not to accept the 15-day public comment with the proposed revisions. The ANSI reference standard is needed to define the wood screws for the additional option proposed in Item 2 of this section.

DSA intends to study the recommendations from this proposal for consideration of action during a subsequent code cycle. Therefore, this item continues unchanged from the 15-day Express Terms version.

## ITEM - MULTIPLE

### **Commenter(s) and Recommendation:**

Matthew Gross, Youngdahl Consulting Group, Inc. recommends revision of Sections 1705.6, 1806.3.4, and 1807.2.3, regarding geotechnical inspection, prescriptive design of isolated pole footings, and safety factors for retaining walls.

### **Agency Response:**

DSA will not be taking action during this rulemaking cycle in response to these comments. The sections identified for proposed revision (1705.6, 1806.3.4, and 1807.2.3) are outside of the 15-day comment changes and appear to be for other agencies. DSA intends to study these proposals for consideration of action during a subsequent code cycle.

## **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.