

**NINE-POINT CRITERIA ANALYSIS  
OF  
PROPOSED BUILDING STANDARDS  
OF THE  
CALIFORNIA BUILDING STANDARDS COMMISSION**

**REGARDING THE CALIFORNIA GREEN BUILDING STANDARDS CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 11**

Building standards submitted to the California Building Standards Commission for approval are required, by Health and Safety Code Subsection 18930(a), to be accompanied by an analysis which will, to the satisfaction of the Commission, justify their approval. The approval of these proposed building standards is justified as follows:

**1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.**

The proposed building standards do not conflict with, overlap or duplicate other building standards. The California Building Standards Commission (CBSC) is proposing only the amendment of the 2013 California Green Building Standards Code (CGBSC) with necessary amendments as part of Title 24, Part 11.

**2) The proposed building standards are within the parameters established by enabling legislation, and are not expressly within the exclusive jurisdiction of another agency.**

CBSC is the state agency enabled by legislation to adopt and publish green building standards in the California Building Standards Code for California.

**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.**

The standards, intended to reduce greenhouse gas emissions, energy and water use, and construction waste; and to improve indoor and outdoor environmental quality, are in the public interest since they promote health and welfare.

**4) The proposed building standards are not unreasonable, arbitrary, unfair, or capricious, in whole or in part.**

CBSC has determined the proposed regulations are 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.**

CBSC has determined in its economic and fiscal impact statement that the cost to the public is reasonable, and that there are associated tangible and intangible benefits from the proposed standards.

**6) The proposed building standards are not unnecessarily ambiguous or vague, in whole or in part.**

CBSC is proposing only to amend the state code with necessary amendments for use as Title 24, Part 11. This action 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.**

*(Health and Safety Code Section 18930 requires a statement of inadequacy of a national specification, published standard or model code if it does not adequately address the goals of the state agency, OR a statement informing the Commission that no national specification, published standard, or model code that is relevant to the proposed building standards exists.)*

CBSC is proposing only to amend California code with necessary amendments for use as Title 24 Part 11

**8) The format of the proposed building standards is consistent with that adopted by the Commission.**

Since the adoption of the California Green Building Standards Code, national green building standards and model codes have been developed. California has not adopted the national code at this time, but may do so in the future as it evolves.

**9) The proposed building standards, if they promote fire and panic safety as determined by the State Fire Marshal, have the written approval of the State Fire Marshal.**

The proposed building standards have been sent to the State Fire Marshal for review and approval. CBSC understands that these proposed regulations do not promote fire and panic safety. Written approval by the State Fire Marshal to these proposed amendments has been received.