

**FINAL STATEMENT OF REASONS
FOR
PROPOSED AMENDMENTS
OF THE
DIVISION OF THE STATE ARCHITECT – ACCESS COMPLIANCE**

**REGARDING THE ADOPTION OF
CALIFORNIA BUILDING STANDARDS ADMINISTRATIVE CODE
INTO THE CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 1**

Chapter 5 - Articles 1, 2, 3, and 4

UPDATES TO THE INITIAL STATEMENT OF REASONS: None – Any updates to the initial statement of reasons are included in DSA/AC change to accommodate public comments.

MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS: The DSA/AC has determined that the following proposed regulatory actions would not impose a mandate on local agencies or school districts.

OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATIONS

Name: Richard Skaff, Susan Chandler, Connie Arnold, Marta Russell, Kathleen Berman, Noel Neudeck, Hollyn D'Lil, Laura Williams, Sharon Toji

Comment: 5-110, 5-201, & 5-205.

Support unless change results in elimination of access compliance section.

There is some concern that the wording of the change incorporates the ELIMINATION of the Access Compliance Section within the Department. CDR is opposed to the elimination of the Access Compliance Section. CDR supports the other changes as presented.

I am somewhat apprehensive about the removal of a specific Access Compliance Section of the DSA, with a Chief. In my experience, when there is no dedicated division, department or person in charge of access, less attention is paid to issues, and personnel do not have the in depth knowledge required. This is a large state with a huge budget and many access issues. It deserves a dedicated department at the Division of the State Architect, in my opinion.

DSA/AC Change to Accommodate: No new code change is proposed to address this comment. No proposal has been made to eliminate the Access Compliance Section at the Division of the State Architect (DSA). The DSA headquarters office undergoes periodic reorganization with sections and units being renamed but function being maintained; e.g., the DSA/ORS section has not existed in name for approximately 10 years. This change will eliminate the need to make continual updates to the text of this chapter as section name changes occur.

COMMENTS MADE BY THE OFFICE OF SMALL BUSINESS ADVOCATE (GC§ 11347.6)

The DSA/AC has not received comments from the Office of Small Business Advocate.

COMMENTS MADE BY THE TRADE AND COMMERCE AGENCY (GC§ 11347.6)

The DSA/AC has not received comments from the Trade and Commerce Agency.

STATEMENT CONFIRMING COMPLIANCE WITH GOV 11346.7.1

The DSA/AC has complied with requirements in making all documents in this rulemaking available to the public. All public Notices are posted on the CBSC website at: <http://www.bsc.ca.gov>, see 2006 Annual Code Adoption Cycle. The 45-day Notice of written comment periods from:

- Sep 01 – Oct 16, 2006 addressing Parts 1 (CAC), 2 CBC (IBC & DOJ), 9 (CFC) and 12 (CRSC) and
- Sep 08 – Oct 23, 2006 addressing Parts 3 (CEC), 4 (CMC) and 5 (CPC)

were both mailed on Sep 06, 2006 to every person who filed a request for notice of regulatory actions with DSA/AC.

The 15-day Notice of written comment period from:

- Oct 26 – Nov 09, 2006 regarding Parts 2 CBC (both IBC & DOJ), 3 (CEC), 5 (CPC) and 9 (CFC)

was mailed on Oct 25, 2006 to every person who filed a request for notice of regulatory actions with DSA/AC.