

**FINAL STATEMENT OF REASONS  
FOR  
PROPOSED BUILDING STANDARDS  
OF THE  
CALIFORNIA BUILDING STANDARDS COMMISSION (CBSC)**

**REGARDING ADOPTION OF THE 2011 INTERNATIONAL EXISTING BUILDING CODE (IEBC)  
CALIFORNIA CODE OF REGULATIONS (CCR), TITLE 24, PART 10  
2013 CALIFORNIA EXISTING BUILDING CODE**

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:**

The CBSC finds that no revisions have been made which would warrant a change to the initial statement of reasons for changes to format consistent with other state agencies.

**MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS**

The California Building Standards Commission has determined that the proposed regulatory action would impose a mandate on local agencies or school districts. However, the mandate does not require reimbursement pursuant to Part 7 (commencing with section 17500) of Division 4, Government Code. H&SC section 18928 requires the CBSC to adopt the most current edition of the model codes. H&SC 18938(b) makes applicable the most current edition of the model existing building code to all occupancies throughout the State of California as prescribed.

**OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATION(S).**

**CBSC Code Advisory Committee (CAC) Comments/Recommendations**

CBSC's Structural Design / Lateral Forces CAC (SD/LF) recommended approve as submitted.

**Public Comments received during 45-Day comment period August 31 – October 15, 2012**

**COMMENTER:** Marko Schotanus, SEAOC, Existing Building Committee; Submitted two comments for Approve as Amended for Section A104 Symbols and Notations and Section A106.2 Existing Materials.

**RESPONSE:** CBSC declined to adopt Mr. Schotanus's recommendation. CBSC did not propose modifications to this section during this Triennial Code Adoption Cycle. BSC understands the concerns of the commenter and will consider these comments in a future rulemaking cycle.

**DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS**

The CBSC has determined 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

**REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:**

There were no proposed alternatives. The CBSC has determined that the proposed regulations will have no adverse impact on small businesses

**COMMENTS MADE BY THE OFFICE OF SMALL BUSINESS ADVOCATE**

The CBSC received no comments from this office.

**COMMENTS MADE BY THE TRADE AND COMMERCE AGENCY**

The CBSC received no comments from this agency.