

INITIAL STATEMENT OF REASONS
FOR
PROPOSED BUILDING STANDARDS
OF THE
DIVISION OF THE STATE ARCHITECT - STRUCTURAL SAFETY (DSA-SS AND DSA-SS/CC)
REGARDING THE CALIFORNIA ADMINISTRATIVE CODE,
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 1, CHAPTER 4

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE and BENEFITS:

The Division of the State Architect - Structural Safety (DSA-SS) proposes to make amendments to Chapter 4 of the California Administrative Code (Part 1, Title 24) for codification as the 2016 edition California Administrative Code.

These proposed amendments to existing administrative regulations pertain to building construction for public elementary and secondary schools, and community colleges. The amendments would modify existing provisions to streamline construction-phase procedures for oversight of school building projects and facilitate project certification. In addition, DSA proposes editorial changes to clarify existing provisions and provide conformance with the proposed changes by DSA-SS to Part 2, Title 24, in this rulemaking cycle [adoption of the 2015 edition International Building Code (IBC)].

The specific purpose and rationale for necessity of these proposed changes follows:

4-205. Application of building standards.

The proposed change is editorial to update Parts 9 and 10 of Title 24, C.C.R.

4-210. Plans, specifications, computations and other data.

Subsection (c):

The proposed change is editorial to eliminate a duplicative statement in the existing regulation.

4-219. Duties of the project inspector.

Subsection (b):

Item 4: DSA proposes to relocate the final sentence in Item 4.C. into its own following paragraph since the content of the statement applies to all of Items 4.A., 4.B. and 4.C.

Per CAC member comment, DSA performed an editorial change regarding format for consistency.

4-220. Duties of the contractor.

Subsection (b):

The proposed change is editorial to modify the reference from “change orders” to “construction change documents”, which by definition includes change orders, consistent with DSA operational processes.

4-221. Records.

The proposed change is editorial to modify the reference from “change orders” to “construction change documents”, which by definition includes change orders, consistent with DSA operational processes.

4-302. Scope.

Subsection (a):

Editorial code reference update

4-302. Scope.

Subsection (b):

DSA proposes to delete the provision for “Short term temporary” buildings as they apply to K-12 public schools and replace with “Emergency” buildings to meet structural code requirements. The term “temporary” school building will be changed to “relocatable” school building used following disasters such as earthquakes, fires and floods, and will extend emergency use to include other unanticipated emergency classroom needs. These changes are required since the statute allowing the use of commercial “trailer” coaches in section 17292 of the California Education Code sunsets in September of 2015; and for all cases, relocatable buildings are required to comply with structural code requirements. Emergency use will not include temporary-use buildings for modernization projects, however such temporary-use buildings will still be applicable for specific fire and life safety purposes, including modernization projects as regulated in Chapter 9 of the California Building Code.

Item 1: DSA proposes to delete the statement allowing temporary certification for 24 months. The previous item 2 limiting the building to a one-story relocatable building will be relocated to item 1.

Item 2: DSA proposes to repeal the previous item 3 requirement for the building to have been designed and constructed to the 1976 Uniform Building Code, and replace with the requirement for DSA’s certification of the relocatable building.

DSA proposes to delete the previous item 4 requiring quality control procedures acceptable to DSA.

DSA proposes to delete the previous item 5 requiring a report is provided showing that the building has not sustained structural deterioration.

Item 3: DSA proposes to renumber previous item 6 to item 3; which requires a foundation system to be accepted by DSA.

Item 4: DSA proposes to repeal the previous item 7 requirement that all construction be inspected by a DSA certified project inspector, and replace with the reference to Part 1, section 4-333 which defines the requirements for observation of construction by the project inspector.

DSA proposes to delete the previous item 8 requiring an architect or structural engineer to prepare site plans. This requirement is duplicative with new section added below.

Item 5: DSA proposes to specify the requirement that verified reports be provided in compliance with Part 1, section 4-336; which details the requirements for all parties involved in the construction who are required to submit verified reports.

Item 6: DSA proposes to adopt a requirement for the school district to notify DSA of an emergency and the intent to use the emergency provisions.

Item 7: DSA proposes to adopt a regulation allowing the school district to install emergency relocatable buildings prior to DSA approval; however within 14 days following the installation shall notify DSA of the extent of the damage to existing buildings and the number of relocatable buildings installed on the campus.

Item 8: DSA proposes to adopt a regulation requiring an architect or structural engineer in responsible charge submit complete construction documents to DSA for approval within 60 days of installation of the emergency buildings.

4-306. Approval of new school buildings, rehabilitation of school buildings and additions to school buildings.

DSA proposes editorial changes to clarify when a rehabilitation of an existing school building is required. The proposal eliminates the term “structural” rehabilitation to clarify that other construction work, including fire and life safety and accessibility upgrades, may be required as part the rehabilitation. The proposal also specifies school district requirements if they voluntarily elect to rehabilitate an existing school building.

The proposal updates the code references from Chapter 34: Existing Buildings of the previous CBC to equivalent sections within Part 10, Title 24, C.C.R.

The proposal identifies that the provisions do not apply to temporary-use buildings for community colleges.

Per CAC member comment, DSA performed editorial changes to correct code references.

4-307. Rehabilitation of an existing nonconforming building for use as a school building.

Subsection (a):

The proposal updates the code references from Chapter 34: Existing Buildings of the previous CBC to equivalent sections within Part 10, Title 24, C.C.R.

The proposal eliminates the term “structural” rehabilitation to clarify that other construction work, including fire and life safety and accessibility upgrades, may be required as part of the rehabilitation.

Per CAC member comment, DSA performed editorial changes to fix incorrect code references.

4-309. Reconstruction or alteration projects in excess of \$25,000 in cost.

Subsection (a):

The proposal relocates general requirements applicable to all reconstruction or alteration projects to the top of the section, and relocates specific requirements applicable only to reconstruction or alteration projects between \$25,000 and \$100,000 to the bottom of the section. This change eliminates confusion between when the general provisions and specific provisions apply.

The proposal clarifies that reconstruction or alteration work shall comply with currently effective regulations where not otherwise regulated in this section.

The proposal requires compliance to Part 10: Existing building requirements for modifications to gravity load carrying members.

The proposal repeals general requirements for structural modifications to existing structural systems and replaces them with specific criteria for structural modifications to existing school buildings.

The proposal clarifies when voluntary modifications to the lateral-force resisting system may be permitted.

Per CAC member comment, DSA performed editorial changes to clarify a code reference and to maintain terminology consistency.

Item 2: The proposal eliminates duplicative reference to “fire and life safety” within this section.

Subsection (c):

The proposal eliminates the term “structural” rehabilitation from the section title since other construction work, including fire and life safety and accessibility upgrades, may be required as part of the rehabilitation.

The proposal replaces “wind and seismic force requirements” with “wind and seismic requirements”, eliminating the term “force”, to include other structural performance criteria in the evaluation of a structure.

Item 1: The proposal removes duplicative language that the project exceeds “\$25,000” since the section title pertains only to projects that exceed \$25,000.

The proposal provides editorial clarification to inclusion of voluntary modifications in project cost.

Item 2: The proposal removes duplicative language that the project exceeds “\$25,000” since the section title pertains only to projects that exceed \$25,000.

Item A: The proposal clarifies that an increase in wind force is due to an increase in surface area.

The proposal adds that the cumulative effect of a proposed and all previous alterations be included in the percentage that triggers rehabilitation of a building. This evaluation is necessary to ensure multiple alterations do not accumulate into or create a potentially dangerous condition.

Item B: The proposal repeals the current provision triggering rehabilitation based upon structural capacity of a component, and replaces with a rehabilitation trigger based upon the structural capacity or stiffness of a story. The cumulative effect of previous alterations is to be considered. This change is necessary to remove ambiguity in application of the current provision by defining when minor modifications will trigger rehabilitation of the structure.

The proposal provides an exception to Items A and B, allowing to reason that if all structural elements affected by a modification comply with current code, ignoring strengthening or stiffening of the affected structural elements, then rehabilitation of the entire building is not required. The exception also relocates the provision that the percentage comparison may include previous DSA-approved strengthening of the lateral force-resisting system.

Item C: The proposal adds a prescriptive requirement that any alteration work may not result in a prohibited structural irregularity as defined by code.

Subsection (d) Voluntary lateral force-resisting system modifications.

The proposal updates the code references from Chapter 34: Existing Buildings of the previous CBC to equivalent sections within Part 10, Title 24, C.C.R.

Subsection (e):

The proposal includes editorial changes, and includes damage due to wind.

4-310. School garages, warehouses, storage and similar buildings, dwellings for employees and miscellaneous structures.

The proposal relocates the requirements that DSA approval for accessibility will apply to building types identified in the section title; approvals from other agencies may be required; and such buildings shall not be used for school purposes.

The proposal adds that the requirements of this section apply to school based health centers, social services or support services buildings that qualify under California Education Code, section 17296.

The proposal contains editorial changes to update Parts 9 and 10 of Title 24, C.C.R. and Education Code section references.

The proposal adds Education Code Section 17296 to the Reference.

4-313. General.

The proposal contains editorial updates to Education Code section references.

4-314. Definitions.

ADDITION: The proposal revises the definition of Addition based upon use and occupancy regardless of whether attached or detached. This definition aligns with fire and life safety regulations related to additions to existing buildings.

ALTERATION: The proposal clarifies that an alteration means any construction to an existing certified school building other than a reconstruction, rehabilitation or addition.

REHABILITATION: The proposal adds the term “evaluation” to clarify that rehabilitation includes “evaluation and” retrofitting.

SCHOOL BUILDING: The proposal modifies the definition of structures not considered a school building as follows:

- Repeals “antenna towers less than 25 feet above a building roof line” since this provision is no longer reasonable given the configuration of antenna towers in current marketplace.
- Repeals “trailer coaches” since the statute provision sunsets in September 2015.
- Clarifies that temporary–use buildings are applicable for community colleges.
- Adds regulation defining school board responsibilities for the preparation of plans and specifications and construction inspection in compliance with Title 24, C.C.R. as adopted by the Building Standards Commission.

TEMPORARY-USE BUILDING COMMUNITY COLLEGE: The proposal modifies the previous definition to apply to community colleges to differentiate with temporary-use buildings for K-12 public schools.

TEMPORARY-USE BUILDING K-12: The proposal adds a definition for temporary-use buildings for K-12 public school buildings to establish the definition for consistency with the fire and life safety regulations which do allow temporary-use buildings, and to differentiate with temporary-use buildings for community colleges.

Per CAC member comment, DSA performed an editorial change for consistency.

TRAILER COACH: The proposal repeals the definition of “trailer coaches” since the provision in section 17292 of the California Education Code sunsets in September 2015.

The proposal contains editorial updates to Education Code section references.

4-315. Application for approval of drawings and specifications.

Subsection (a):

Item 3: The proposal adds the reference from temporary-use building to temporary-use community college building to differentiate with temporary-use buildings for K-12 public schools.

Item 3. Exception: The proposal revises the provision that school boards may award a contract for emergency housing in compliance with Section 4-302(b) Emergency buildings to coordinate with the revised provisions of Section 4-302(b).

Item 4: The proposal repeals the general provision for temporary-use buildings for K-12 school buildings to be consistent with the proposed revisions to Section 4-302(b) Emergency buildings. This change is necessary since the statute allowing the use of commercial "trailer" coaches in section 17292 of the California Education Code sunsets in September of 2015, and DSA certified relocatable buildings are required to comply with structural code requirements. Thus, temporary buildings will no longer comply with structural code requirements for K-12 public schools. However, temporary use buildings will still be applicable for specific fire and life safety purposes, including modernization projects. Those conditions are regulated in Chapter 9 of the California Building Code, and are being removed from this section of the regulations to eliminate duplicity and potential conflicts.

Item 5: The proposal is editorial and renumbers item 5 to item 4 due to the repeal of item 4.

Subsection (b):

The proposal repeals the provision allowing construction of a number of school buildings on various and separate school sites under a single project application to be consistent with DSA policy promoting successful certification of all school projects.

4-316. Designation of responsibilities.

Subsection (a) General responsible charge.

DSA proposes editorial changes to clarify the exception within the section.

This proposal repeals the separate assignment of responsible charge by parts since this provision is not substantiated in the Education Code.

Subsection (b) Delegation of responsibility.

DSA proposes editorial changes to clarify the delegation of responsible charge and make consistent throughout the remainder of Part 1, Group 1.

This proposal repeals the requirement that observation of construction must be performed by the same person delegated responsible charge for preparation of the plans and specifications since this provision is not substantiated in the Education Code.

Subsection (c) Assumption of responsibility.

This proposal repeals previous language and clarifies the assumption of duties to be performed as defined in other sections of Part 1 so as to be consistent with subsections (a) and (b) of this section.

Subsection (d) Acceptance of responsibility.

DSA proposes editorial changes to clarify the procedure in establishing acceptance of responsibility.

Subsection (e) Evidence of responsibility.

The proposal repeals the section since the requirements are duplicative with section 4-317(h).

Subsection (e) Alternates.

The proposal renumbers the section from (f) to (e) and includes minor editorial clarifications.

4-317. Plans, specifications, calculations and other data.

Subsection (a) General.

DSA proposes minor editorial changes for clarity.

Subsection (b) Plans.

DSA proposes minor editorial changes for clarity.

Subsection (g) Deferred submittals.

Items 1 and 4: DSA proposes minor editorial changes for clarity.

The proposal contains editorial updates to Education Code section references.

4-318. Procedure for approval of application and voidance of application.

Subsection (a) General.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

Rather than DSA printing record sets of approved plans and specifications and charging a fee to recover costs, the proposal adds a provision that DSA may direct the school district to create the record set of plans and specifications.

Subsection (b) Approval of application.

DSA proposes minor editorial changes for clarity.

The proposal contains editorial updates to Education Code section references.

4-319. Withdrawal of application.

DSA proposes minor editorial changes for clarity.

4-321. Fee Schedule 11.

The proposal increases the plan review application filing fee to the maximum amount prescribed in the Education Code, sections 17330 and 81133 from 0.5 percent to 0.6 percent on the amount in excess of \$1,000,000 of the total project cost. This fee increase will enable DSA to cover the costs of operation to maintain the performance objectives for structural plan review and construction oversight mandated by the Field Act.

4-323. Revisions of plans and specifications.

The proposal adds a provision to define a change in scope of work beyond which a revision requires a new application and filing fee. This provision is necessary to manage the costs, time and workload demands that large revisions impose on staff and the process.

4-324. Examples and explanations of fee computation.

The proposal reflects the fee increase in section 4-321 in the examples of the fee calculation.

4-325. Billing for further fees.

The proposal is editorial by eliminating the dollar limitation for refund claims due to errors in cost reporting or fee computation.

4-333. Observation and inspection of construction.

Subsection (b) Inspection by a project inspector.

DSA proposes minor editorial changes to clarify the project inspector proposed by the school board must be satisfactory to the structural engineer delegated responsible charge.

Item 7: DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

Subsection (c) Special inspection.

The proposal repeals the requirement for special mechanical and electrical inspectors to observe construction when a mechanical or electrical engineer has not been delegated since the design professional in general responsible charge may perform observation of this work.

The proposal contains editorial updates to Education Code section references.

4-333.1. Project inspector certification.

The proposal revises criteria to for individuals to qualify for the Class 1, 2, 3 and 4 project inspector examinations. The changes allow greater opportunity for first-time project inspectors or certified project inspectors seeking to advance to another inspector class.

4-334. Supervision by the Division of the State Architect.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

The proposal adds “the contractor” to the list of individuals and school district who are to receive notifications of necessary modifications to the approved plans from DSA. This change is necessary since statutes have expanded project delivery methods to include design build and lease-lease-back projects in which the contractor is part of the design team.

4-335. Structural tests and special inspections.

Subsection (a) General.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

Subsection (d) Test reporting requirements.

Item 4: The proposal changes the requirement that reports of on-site tests must be submitted to the project inspector from “on the day” to “within one working day” of the test to provide a more reasonable timeline for the laboratory manager or special inspector to prepare and submit.

Item 5: The proposal reduces the requirement that material testing reports must be submitted to the project design team from 14 days to 7 days to provide a more timely submission by the laboratory or special inspector to avoid delaying construction.

The proposal adds that DSA may request reports to verify compliance or monitor performance of the laboratory manager and/or special inspectors.

Item 5 and 6: The proposal adds “the contractor” to the list of individuals and school district who are to receive test reports. This change is necessary since statutes have expanded project delivery methods to include design build and lease-lease-back projects in which the contractor is part of the design team.

Subsection (e) Verified reports by the laboratory of record.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

Subsection (f) Special inspection.

DSA proposes editorial changes to clarify evidence of proposed special inspector’s knowledge and experience.

Item 1.A. Special inspectors employed by laboratory of record.

Assignment to a project: The proposal changes the requirement such that the laboratory need not submit an identification form for special inspectors employed by that laboratory on a school project. This change simplifies the process for laboratories to assign special inspectors throughout the duration of construction.

Supervision:

Item (ii): The proposal adds definition of the knowledge and experience requirements for special inspectors to be verified by the laboratory manager to ensure the laboratory manager assigns competent and knowledgeable special inspectors to school projects.

Item 1.B. Special inspectors who contract individually and directly with the school board.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

Item 3.E: DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

The proposal adds “the contractor” to the list of individuals and school district who are to receive special inspection reports. This change is necessary since statutes have expanded project delivery methods to include design build and lease-lease-back projects in which the contractor is part of the design team.

Item 4.A: The proposal changes the requirement that special inspection daily reports must be submitted to the project inspector from “on the day” to “within one working day” of the test to provide a more reasonable timeline for the laboratory manager or special inspector to prepare and submit.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

The proposal adds “the contractor” to the list of individuals and school district who are to receive special inspection reports. This change is necessary since statutes have expanded project delivery methods to include design build and lease-lease-back projects in which the contractor is part of the design team.

The proposal reduces the requirement that special inspection reports must be submitted to the project design team from 14 days to 7 days to provide a more timely submission by the laboratory or special inspector to avoid delaying construction.

Item 4.B. Special inspector verified report.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

4-335.1. DSA Laboratory Evaluation and Acceptance program

Subsection (b):

Item 8: Evaluations: The proposal adds criteria requiring that testing laboratories are subject to evaluation by DSA when the laboratories relocate or undergo operational changes to their staff and/or services. Such changes require validation of the laboratory's personnel and operations to comply with code and industry standards.

4-336. Verified reports.

Subsection (a) General.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

Subsection (c) Required filing.

Item 3: The proposal adds that verified reports are also required by design and inspection personnel at milestones of completion to coordinate with DSA policy for timely completion of the project Inspection Card which facilitates project certification throughout construction.

Item 5: DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

4-338. Addenda and construction changes.

Subsection (b) Addenda.

The proposal repeals the previous definition and replaces with a definition requiring only addenda that affect changes to the structural, fire and life safety, and accessibility portions of the work need be submitted to DSA for approval. The proposal more clearly defines the information required in the addenda submittal. This change is needed to reduce unnecessary work by project design professionals and DSA staff.

Subsection (c) Construction changes.

DSA proposes editorial changes to the design professional responsible charge and delegation of responsible charge to be consistent with section 4-316.

The proposal contains editorial updates to Education Code section references.

4-341. Duties of the architect, structural engineer or professional engineer.

Subsections (a), (b), (c), (d) and (f): DSA proposes editorial changes to the design professional in responsible charge and delegation of responsible charge to be consistent with section 4-316.

4-342. Duties of the project inspector.

Subsection (a) General.

DSA proposes editorial changes to the design professional in responsible charge and delegation of responsible charge to be consistent with section 4-316.

Subsection (b) Duties.

DSA proposes editorial changes to the design professional in responsible charge and delegation of responsible charge to be consistent with section 4-316.

Item 1: DSA proposes that the project inspector shall verify special inspector's certifications for the work to be inspected. This addition is to ensure that special inspectors assigned work by the laboratory manager or who are employed by the school district are qualified to inspect the work.

Per CAC member comment, DSA performed editorial change regarding punctuation.

Item 3.E: DSA proposes editorial changes to repeal the term "change orders" and revise as "construction" change documents to require approval of change documents while construction is ongoing.

Item 5.C: This proposal adds requirements for the project inspector to notify DSA within 48 hours of start of masonry grout placement, or when otherwise requested by DSA, to allow DSA staff to visit the job site prior to that work.

4-345. Request for examination.

The proposal contains editorial updates to Education Code section references.

4-350. Records.

The proposal contains editorial updates to Education Code section references.

4-355. Advisory board.

Subsection (c) Meetings. The proposal contains editorial updates to Education Code section references.

4-401. Purpose.

DSA proposes minor editorial changes for clarity.

4-402. Scope.

The proposal contains editorial updates to Education Code section references.

4-404. Alternate materials and methods of construction and modifications.

DSA initially proposed to revise Section 4-404 by striking out the reference to the State Fire Marshal which authorizes the State Fire Marshal to approve alternate materials and methods of construction. Upon discussion with the State Fire Marshal, DSA is eliminating this proposal and removing this section from the code package as no other revisions to the section have been proposed.

4-410. General.

The proposal contains editorial updates to Education Code section references.

4-411. Definitions.

The proposal contains editorial updates to Education Code section references.

4-430. General.

Subsection (f) Verified Reports.

The proposal contains editorial updates to Education Code section references.

4-435. General.

DSA proposes minor editorial changes for clarity.

TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS:

These administrative regulations are applicable to Parts 2, 3, 4, 5, 6, 9, 10, 11 and 12 of Title 24, California Code of Regulations. No technical reports or studies were used in the development of these proposed amendments.

STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS:

The proposed amendments do not contain any mandates for specific technologies or equipment or prescriptive standards.

CONSIDERATION OF REASONABLE ALTERNATIVES

The Division of the State Architect considered the performance standards in the International Existing Building Code requiring evaluation and retrofit of existing buildings for lateral forces; however determined that those standards were not equivalent to the performance objectives mandated in the Field Act to ensure public safety and protection of property. The Division of the State Architect did not identify nor determine any reasonable alternatives to the other proposed administrative regulations.

REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS.

The Division of the State Architect did not identify any reasonable alternatives to the proposed administrative regulations that would lessen adverse impact on small business.

FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE IMPACT ON BUSINESS.

No adverse effect on business was determined and no other documents are required, with the exception that Section 4-321: Fee Schedule 11 will increase school district fees paid to DSA approximately \$2,700,000 per year.

ASSESSMENT OF EFFECT OF REGULATIONS UPON JOBS AND BUSINESS EXPANSION, ELIMINATION OR CREATION

(Government Code Sections 11346.3(b)(1) and 11346.5(a)(10))

The Division of the State Architect has assessed whether or not and to what extent this proposal will affect the following:

- The creation or elimination of jobs within the State of California.

The Division of the State Architect did not identify any amended regulation that would lead to the creation or elimination of jobs.

- The creation of new businesses or the elimination of existing businesses within the State of California.

The Division of the State Architect did not identify any amended regulation that would lead to elimination of existing businesses.

- The expansion of businesses currently doing business with the State of California.

The Division of the State Architect did not identify any amended regulation that would lead to the expansion of businesses currently doing business with the State of California.

- The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.

Part 1, California Administrative Code is the administrative regulations for application of the California Building Code, implementation of construction testing and inspection programs, and certification of construction for the protection of life and property of public K-14 school buildings in compliance with the California Education Code and state-owned or state-leased essential services buildings in compliance with the California Health and Safety Code.

ESTIMATED COST OF COMPLIANCE, ESTIMATED POTENTIAL BENEFITS, AND RELATED ASSUMPTIONS USED FOR BUILDING STANDARDS

The proposed changes to the regulations are editorial to provide clarity, and do not result in an increase to the cost of compliance in the application and implementation of the California Administrative Code or California Building Code, with the following exception:

Section 4-321: Fee Schedule 11 will increase project filing fees paid to DSA approximately \$2,700,000 per year for structural safety plan review and construction oversight. The current filing fee, based upon Sections 17300 and 81133 of the California Education Code, is 0.7 percent for the first \$1,000,000 of the estimated cost of construction plus 0.5 percent for estimated costs above \$1,000,000. This fee increase will raise the multiplier for estimated costs above \$1,000,000 to the highest amount allowed in the California Education Code from 0.5 percent to 0.6 percent. The fee increase will allow DSA to cover operational costs to maintain services mandated by the Field Act (Sections 17280 and 81130) to ensure public safety and protection of property of California's public schools and community colleges.

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

These proposed administrative regulations do not duplicate or conflict with federal regulations.