

**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 MECHANICAL CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 4  
  
2016 CALIFORNIA MECHANICAL CODE**

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons (ISOR) 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 purpose of this proposed action is to adopt the 2016 California Mechanical Code (CMC) based on new information since the adoption of the 2013 CMC, and to carry forward administrative amendments.

**Title 24, Part 4  
Chapter 1 – ADMINISTRATION**

**Section 1.1.1 Title**

Editorial change to clarify DSA adoption of the most current model code (2015 edition Uniform Mechanical Code).

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

2015 UMC: Uniform Mechanical Code

**STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS:**

Health and Safety Code (H&SC) Section 18941 requires consistency with state and nationally recognized standards for building construction in view of the use and occupancy of each structure to preserve and protect the public health and safety.

**CONSIDERATION OF REASONABLE ALTERNATIVES:**

The alternative to these proposed regulations would be to leave regulations as they are which will be inconsistent with H&SC 18941 requirements.

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

The regulations proposed will have no adverse impact on small business, since they are equivalent to the current requirements in the Code.

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

The regulations proposed will have no adverse economic impact on business, since they are equivalent to the current requirements in the Code.

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

The Division of the State Architect (DSA) 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.

There will be no positive or adverse impact.

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

There will be no positive or adverse impact.

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

There will be no positive or adverse impact.

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

There will be no positive or adverse impact.

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

The regulations proposed will have no overall cost impact, since they are equivalent to the current requirements in the Code.

**DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS.**

The regulations proposed do not duplicate or conflict with federal regulations.