

**FINAL STATEMENT OF REASONS  
FOR  
PROPOSED BUILDING STANDARDS  
OF THE  
DIVISION OF THE STATE ARCHITECT – STRUCTURAL SAFETY (DSA-SS)**

**REGARDING ADOPTION OF AMENDMENTS TO THE 2013 CALIFORNIA GREEN BUILDING  
STANDARDS CODE, CALIFORNIA CODE OF REGULATIONS (CCR), TITLE 24, PART 11**

**(DSA-SS EF 05/15)**

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**

DSA-SS finds that revisions have been made which warrant changes to the initial statement of reasons for the following sections as proposed for public comment based on comments received:

- Upon further review of the Initial Statement of Reasons (ISOR), DSA is deleting and replacing the statements under the following subtitles because these topics regarding the cost impacts on the private sector are not applicable to the DSA:

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

DSA's proposed regulations only apply to public schools and community colleges.

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

DSA's proposed regulations only apply to public schools and community colleges.

**MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS**

DSA has determined that the proposed regulatory action will not impose a mandate on local agencies or school districts and the mandate does not require reimbursement pursuant to Part 7 (commencing with section 17500) of Division 4, Government Code.

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

**EMERGENCY RULEMAKING**

No comments were received by DSA.

**45-DAY CERTIFYING RULEMAKING**

**COMMENTER:** Matt Sigler, Technical Director, Plumbing Manufacturers International

**Comment:** PMI supports the actions of DSA in aligning the plumbing fixture and fitting flow rate requirements for urinals and residential lavatory faucets with Title 20.

**Response:** Appreciation of PMI's support.

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

This is not applicable to the DSA because DSA's proposed regulations only apply to public schools and community colleges.

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

This is not applicable to the DSA because DSA's proposed regulations only apply to public schools and community colleges.