

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

REGARDING THE CALIFORNIA GREEN BUILDING STANDARDS CODE
FOR USE IN THE CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 11**

The Administrative Procedure Act 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 AND RATIONALE FOR PROPOSED CHANGES

Green building standards proposed by DSA-SS for adoption would be applicable to public elementary and secondary schools, and community colleges.

The proposed action is editorial only, and does not mandate any design, construction or commissioning requirements for occupancies under DSA jurisdiction (public elementary and secondary schools, and community colleges).

The Building Standards Commission is developing and adopting the first edition of California's green building standards code (Part 11, Title24) within this 2007 rulemaking cycle. DSA is proposing to only adopt administrative provisions at this time, and will propose green design, construction and commissioning standards within a subsequent rulemaking cycle for incorporation into the 2010 edition Title 24 California Building Standards Code.

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

The Division of the State Architect is proposing editorial administrative provisions only, which are not based on any studies or reports.

CONSIDERATION OF REASONABLE ALTERNATIVES

The Division of the State Architect has not considered any reasonable alternatives to the proposed action.

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

The Division of the State Architect has not identified any reasonable alternatives to the proposed action, and no adverse impacts to small business will occur as a result of this proposed action.

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

The Division of the State Architect has no evidence indicating any potential significant adverse impact on business with regard to this proposed action.

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

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