

**NINE-POINT CRITERIA ANALYSIS  
FOR  
PROPOSED BUILDING STANDARDS  
OF THE  
DIVISION OF THE STATE ARCHITECT - STRUCTURAL SAFETY (DSA-SS)**

**REGARDING THE CALIFORNIA BUILDING STANDARDS ADMINISTRATIVE CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 1**

Building standards submitted to the California Building Standards Commission for approval are required, per Health & Safety Code Subsection 18930 (a) to be accompanied by an analysis that will, to the satisfaction of the Commission, justify their approval. The approval of these proposed building standards is justified as follows.

**1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.**

The proposed code change does not conflict with, overlap or duplicate other building code standards. The proposed code change permits DSA to extend project approvals which would otherwise be voided due to delay of construction commencement caused by the state bond fund freeze (Department of Finance Budget Letter No. 08-33 dated December 18, 2008).

**2) The proposed building standards are within the parameters established by enabling legislation, and are not expressly within the exclusive jurisdiction of another agency.**

DSA is the state agency enabled by legislation to adopt building standards for public elementary and secondary schools, and community colleges per Education Code Sections 17310 and 81142.

**3) The public interest requires the adoption of these building standards.**

The adoption of this code change proposal is required in order for school districts to avoid unintended hardships due to the recent state bond fund freeze. The proposed code change permits DSA to extend project approvals which would otherwise be voided due to delay of construction commencement caused by the state bond fund freeze (Department of Finance Budget Letter No. 08-33 dated December 18, 2008). These hardships would include both monetary expense and time delay due to the requirement that project approvals, if voided, could only be obtained through resubmittal of plans & specifications to DSA for review and approval.

**4) The proposed building standards are not unreasonable, arbitrary, unfair or capricious, in whole or in part.**

The proposed code change is not unreasonable, arbitrary, unfair or capricious, in whole or in part. The proposed extension of project approval status for up to one year does not allow project designs to comply with outdated codes or standards, as there are no significant code changes that will become effective within this time period.

**5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.**

There is no cost to the public pursuant to this proposed code change.

**6) The proposed building standards are not unnecessarily ambiguous or vague, in whole or in part.**

The proposed code change is not unnecessarily ambiguous or vague, in whole or in part.

**7) The applicable national specifications, published standards and model codes have been incorporated therein as provided in this part, where appropriate.**

The proposed code change is not related to any model code, national standards or specifications.

**8) The format of the proposed building standards is consistent with the format adopted by the Commission.**

The format of the proposed code change is consistent with the format adopted by the Building Standards Commission for Part 1, Title 24.

**9) The proposed building standards, if they promote fire and panic safety as determined by the State Fire Marshal, have the written approval of the State Fire Marshal.**

The proposed code change does not prescribe fire and panic safety design or construction.