**Application Package Instructions**

California Building Standards Commission & California Energy Commission

Congratulations on passing your local decarbonization amendment! Your jurisdiction must now file your local amendment with the relevant California agencies. This package of documents contains materials for state filing, and if necessary, state approval of your local amendment. Please complete the following steps, in accordance with your City/County Attorney guidance:

1. Fill out documents listed in the table below with jurisdiction specific information. If amending Title 24 Part 6 with energy efficiency or conservation measures, proceed to Step 2. If amending other sections of the building code or municipal code with measures that do not govern efficiency or conservation, skip to Step 4.
2. Submit the Part 6 amendment requiring efficiency or conservation measures to the California Energy Commission (CEC). Visit the [CEC Local Amendment Docket Log](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-BSTD-07) to see examples of posted filings.
3. Email [LocalOrdinances@energy.ca.gov](mailto:LocalOrdinances@energy.ca.gov) and cc your Community Choice Aggregator representative, [FFarahmand@trccompanies.com](mailto:FFarahmand@trccompanies.com), and any other TRC team members supporting your local amendment. CEC will work with you to address any questions they may have, post your application for public comment, and present your application at a future CEC Business Meeting.
4. File all buildings-related ordinances with the California Building Standards Commission (CBSC) by emailing [Ordinancefilings@dgs.ca.gov](mailto:Ordinancefilings@dgs.ca.gov), including all required documents. Copy your Community Choice Aggregator representative, [FFarahmand@trccompanies.com](mailto:FFarahmand@trccompanies.com), and any other TRC team members supporting your local amendment. This step can be done simultaneously to Step 3; CEC approval is not required before filing with the CBSC.

Table 1 below includes required or recommended materials for cities submitting applications to either the CBSC or CEC. These materials have been developed from review of state agency documents, listed at the end of this memo for reference. TRC has provided some template materials in the package, with fields requiring jurisdiction customization highlighted in gray.

Table 1. Submittal Requirements

|  |  |  |  |
| --- | --- | --- | --- |
| Attachments | CEC | CBSC | Notes |
| 1: Cover Letter | *Recommended – see notes* | Required | Update with specific details for jurisdiction and amendment. Ensure you are specifying the state law providing the authority for the amendment. This verbiage may be in the body of the email rather than a separate attachment. |
| 2: Staff Report | Required | Required | Append your staff report used during adoption. |
| 3: Signed Ordinance | Required | Required | Include the following elements:   1. Building Code section being amended, if any, and distinguish the amendment text from the text of Title 24 not being amended. 2. Express findings that amendments to the building standards in Title 24 are reasonably necessary because of local climatic, geological, or topographical conditions, or environmental conditions for green building standards code amendments. |
| - | 1. Express findings or proclamations that the ordinance complies with the requirements for locally adopted energy standards in Title 24 Part 1 Section 10-106. |
| 4: Copy of Cost Effectiveness Studies | Required | - | Include the same cost-effectiveness studies that were included as part of Council deliberations. |
| 5: Demonstration of Cost Effectiveness | Required | - | Include a document that describes how the results were used to determine the ordinance parameters. TRC can provide this to you, or you may include this information in the staff report. |
| 6: Notice of Exemption from the California Environmental Quality Act (CEQA) | Required | - | Fill out the State’s [CEQA Notice of Exemption](https://lci.ca.gov/sch/docs/20210820-NOE.pdf) form and file locally with your city or county. They will add either a physical stamp of approval or clerk signature to demonstrate the filing was completed and accurate. Scan a copy with the stamp or signature to include with your CEC filing. TRC provides a guide for this form. |

## ADA Compliance

The CEC must comply with federal and State standards for accessibility. To meet these requirements, please review the accessibility checklist. This includes instructions on resolving a common ADA compliance issue, which is by ensuring all PDF documents are searchable.

### Digital Accessibility Basics Checklist

* **Font:** 
  + 12 pt is the minimum font size
  + Use a sans-serif font (Arial, Calibri, Futura, Helvetica, Open Sans, Roboto)
* **Color Use and Color Contrast:**
  + Use a high contrast ratio between text and background colors
  + In a graph, use fill patterns as well as color to show differences between data
* ​​​**Support Assistive Technology (e.g. screen readers):**
  + Include alternative text for tables and graphs
  + Use hyperlink text instead of full URLs
  + Use headings for titles and section titles
  + Use lists
  + Use simple tables
    - Use table headers
    - Avoid splitting or merging cells
    - Provide a table summary and table caption
  + Verify the document language
    - Under the **Review** tab, select Language, Set Proofing Language…
    - Verify the document language was detected automatically

A screenshot of a computer

AI-generated content may be incorrect.

* **Test Accessibility**
  + Use the built-in accessibility checker
    - Under the Review pane, select Check Accessibility:

A screenshot of a computer

AI-generated content may be incorrect.

### PDF Searchability

The CEC requires that submitted PDFs are searchable. This helps screen readers function properly. Use the steps below to make a PDF searchable, and to check that a PDF is searchable.

#### Creating a searchable PDF in Adobe

1. Open the PDF in Adobe
2. Under the Tools drop-down, select “Recognize Text”
3. Select: PDF Output Style Searchable Image
4. Select OK to create a searchable PDF

#### Creating a searchable PDF in Nitro PDF Pro

1. Open the PDF in Nitro
2. Under the Review tab, select “OCR”
3. Select “Searchable”
4. Select OK
5. Check that the PDF is searchable (instructions in next section).

*Troubleshooting: If the PDF is still not searchable, customize the OCR:*

1. *Under the Review tab, select “OCR”*
2. *Select “Searchable”*
3. *Select “Options”*
4. *Select “Advanced”*
5. *Check: “Use system font based recognition” and “Retain text background”*
6. *Select OK*
7. *Select OK*
8. *Check that the PDF is searchable (instructions in next section)*

#### Checking that a PDF is searchable

In Any PDF Reader:

1. Search for a word known to be in the document (CTRL-F, enter the word).
2. If the word is highlighted after the search, the PDF is searchable

In Adobe Acrobat:

1. Edit > Select all.
2. If all the text is selected, the PDF is searchable. If nothing is selected, the file is not searchable-follow the section(s) above to make the PDF searchable.

## CBSC Reference

If your ordinance included energy efficiency or conservation measures, it requires approval by the CEC. After the CEC approves your ordinance at a Business Meeting, or if your reach code does not include efficiency or conservation measures, you may file with the BSC.

We developed the above guidance based on the CBSC [Guide for Local Amendments of Building Standards](https://www.dgs.ca.gov/-/media/Divisions/BSC/05-Resources/Guidebooks/Guide-Local-Amend-of-Bldg-Stnds-Rev-July-2024.pdf), July 2024, Seventh Edition. The section of the guide which is pertinent for city applications to the CBSC is reproduced below. This guide is located on the [BSC website on local amendments](https://www.dgs.ca.gov/BSC/Codes/Local-Amendments-to-Building-Standards---Ordinances).

Refer to pages 15-16 of the [Guide for Local Amendments of Building Standards](https://www.dgs.ca.gov/-/media/Divisions/BSC/05-Resources/Guidebooks/Guide-Local-Amend-of-Bldg-Stnds-Rev-July-2024.pdf) for common reasons for CBSC Rejection. Reasons include applications that lack detailed amendments or express findings.

*Guide for Local Amendments of Building Standards, pages 6-7*

Local Amendments under the California Building Standards Law

**Amendment authority:** HSC Section 18941.5, with reference to HSC Section 17958.7, allows for more restrictive local amendments that are reasonably necessary because of local climatic, geological, or topographical conditions. CALGreen Section 101.7.1 allows the use of environmental conditions as an acceptable finding. Additional references: HSC 17958.5, CBC 1.1.8 and 1.8.6.2

**Amendment application:** Amendments to Title 24 made under the authority of HSC 18941.5 may apply to any building, or building feature, that is not otherwise subject to another state law. For example, amendments for residential buildings, historic buildings, and energy conservation are affected by other state laws and may not be subject to an amendment made under the authority of HSC 18941.5.

**Document requirements:** Amendment documents must be **expressly marked** to:

• Specify the state law providing the authority for the amendment.

• Identify the Title 24 section being amended and distinguish the amendment text from the text of Title 24 not being amended.

• Indicate that amendments are **more restrictive** building standards than those provided in Title 24.

• Clearly show that the local governing body made an **express finding** that amendments to the building standards in Title 24 are **reasonably necessary because of local climatic, geological, or topographical conditions, including environmental conditions** for green building standards.

**Filing requirements:** Local amendments are not effective or operative until the amendment documents meeting the requirements have been filed with CBSC. Send amendment documents with ordinance identification and governing body official’s signature to:

California Building Standards Commission   
 2525 Natomas Park Drive, Suite 130  
 Sacramento, CA 95833-2936  
 [ordinancefilings@dgs.ca.gov](mailto:ordinancefilings@dgs.ca.gov)

CBSC will issue a letter to the local enforcing agency stating that the code modifications are accepted for filing when they meet the requirements of HSC Sections 17958.7 and 18941.5. For filings that do not meet the requirements, an email will be sent noting any deficiencies. Local amendments accepted for filing will be listed on CBSC’s website.

**Accessibility Requirements:** In order for local amendment documents to be posted on CBSC’s ordinance listing for viewing or downloading by the public, they must be provided in a format that is accessible to persons with disabilities. Alternatively, a jurisdiction may provide a link to their posting of the ordinance on their website for access via CBSC’s ordinance listing. These requirements are detailed later in this guide.

## CEC Reference

If the local ordinance amends energy efficiency or conservation measures, regardless of if those are in Title 24, Part 6 (the Energy Code) or Title 24, Part 11 (CALGreen), you will need to submit to the CEC and wait for the amendment to be approved during a business meeting. Visit the [CEC Local Amendment Docket Log](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-BSTD-07) to see examples of posted filings. The CEC also has a [Local Ordinances](https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-0) resource page to refer to, which has not been updated for the 2025 code as of 8/13/25.

The CEC describes submittal requirements in [Title 24 Part 1 Section 10-106](https://codes.iccsafe.org/content/CAAC2025P1/chapter-10-administrative-regulations-for-the-california-energy-commission-cec#CAAC2025P1_Ch10_Sec10_106) (reproduced below):

**10-106 – LOCALLY ADOPTED ENERGY STANDARDS**

**(a) Requirements.** Local governmental agencies may adopt and enforce energy standards for newly constructed buildings, additions, alterations, and repairs to existing buildings provided the following two requirements are met prior to any enforcement of the standards:

1. A determination that the standards are cost effective is adopted by the local agency at a public meeting and subsequently filed with the Energy Commission; and

2. The Energy Commission finds that the standards will require buildings to be designed to consume less energy than permitted by Title 24, Part 6.

(**b) Documentation Application.** Local governmental agencies wishing to enforce energy standards subject to Section10-106(a) shall submit an application with the following materials to the Executive Director:

1. The proposed energy standards;

2. The local governmental agency's findings and supporting analyses on the energy savings and cost effectiveness of the proposed energy standards;

3. A statement or finding by the local governmental agency that the proposed energy standards will require buildings to be designed to consume less energy than permitted by Part 6; and

4. Any findings, determinations, declarations or reports, including any negative declaration or environmental impact report, required pursuant to the California Environmental Quality Act, Pub. Resources Code Section 21000 et seq.

**NOTE:** Authority: Section 25402.1, Public Resources Code.

**Reference**: Sections 21080.4, 21153, 25402.1, Public Resources Code.