

<b>DOCKETED</b>	
<b>Docket Number:</b>	25-BSTD-03
<b>Project Title:</b>	2028 Energy Code Pre-Rulemaking.
<b>TN #:</b>	267821
<b>Document Title:</b>	Comments on CodeCycle Report Systemic Underestimation of AHJ Impacts from Title 24, Part 6 (42 pages)
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Michael F Malinowski FAIA
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/3/2025 4:48:15 PM
<b>Docketed Date:</b>	12/3/2025

*Comment Received From: Michael F Malinowski FAIA  
Submitted On: 12/3/2025  
Docket Number: 25-BSTD-03*

## **Comments on CodeCycle Report Systemic Underestimation of AHJ Impacts from Title 24, Part 6 (42 pages)**

The CodeCycle report offers a clear and persuasive account of the substantial growth in volume, scope, and complexity of California's Building Energy Efficiency Standards and the extensive supplemental materials over the past two decades. While these regulations have unquestionably advanced the energy performance of California's built environment, the cumulative impacts of applying and enforcing this expanding regulatory framework merit careful attention.

The burden on local building departments and the code officials charged with enforcement has grown significantly. Similarly, the impacts extend across all sectors involved in project delivery, including the more than 11,000 design professionals represented by the American Institute of Architects, California (AIACA), who prepare and manage the plans and specifications for nearly all major building projects in the state.

The temporary pause in residential regulatory changes established by AB 130 provides a timely opportunity to re-examine the overall structure of California's energy regulations and their future trajectory. AIACA welcomes the opportunity to participate in discussions exploring a more streamlined, comprehensible, and cost-effective approach one that remains fully aligned with the state's energy and climate objectives while reducing unnecessary complexity for all stakeholders.

Respectfully submitted

Michael F. Malinowski FAIA  
Consultant American Institute of Architects California  
President Applied Architecture Inc  
President, Streamline Institute Inc 501c3