

**INITIAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS
OF THE CALIFORNIA BUILDING STANDARDS COMMISSION
REGARDING THE 2025 CALIFORNIA BUILDING CODE,
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2
(05/24)**

The Administrative Procedure Act (APA) 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, PROBLEM, RATIONALE and BENEFITS

Government Code Section 11346.2(b)(1) requires a statement of specific purpose of each adoption, amendment, or repeal and the problem the agency intends to address and the rationale for the determination by the agency that each adoption, amendment, or repeal is reasonably necessary to carry out the purpose and address the problem for which it is proposed. The statement shall enumerate the benefits anticipated from the regulatory action, including the benefits or goals provided in the authorizing statute.

General purpose, problem, rationale and benefits: The California Building Standards Commission (BSC) proposes to repeal the adoption of the 2022 California Building Code (CBC), which is based on the 2021 International Building Code (IBC) of the International Code Council (ICC).

BSC proposes to adopt the 2024 IBC, the most recent edition of the model code, for codification and effectiveness into the 2025 edition of the CBC. This action is to meet the requirements of Health and Safety Code (HSC) Section 18928 assuring adoption of the most recent edition of model code within one year of its publication. In addition, HSC Section 18934.5 assures that the commission shall adopt, approve, codify and publish building standards for those occupancies under BSC's authority.

In addition, BSC brings forward existing amendments from the 2022 CBC for inclusion into the 2025 CBC without modification (not shown) and proposes new amendments shown in the rulemaking items below. A statement of specific purpose, problem, rationale and benefit for each item is as follows:

ITEM 1

**Chapter 1 SCOPE AND ADMINISTRATION,
DIVISION I CALIFORNIA ADMINISTRATION,
DIVISION II SCOPE AND ADMINISTRATION**

[BSC proposes to adopt Section 110.3.5 of the 2024 IBC Chapter 1 and bring forward existing California amendments in Chapter 1, Division I, Sections 1.1 and 1.2 and in Chapter 1, Division II, Section 105.5.1 from the 2022 CBC for adoption into the 2025 CBC with the following modifications.]

ITEM 1-1

Section 1.1.1 Title

BSC proposes to update the year of the model code being adopted in this cycle to meet statutory obligation to adopt the latest edition of model code within one year of publication,

and to correctly identify the year of the model code incorporated into the 2025 CBC. This update will clarify the codes available for use in construction and maintain the most current building standards for the protection of public health and welfare in the built environment.

ITEM 1-2

Section 1.1.3.2 State-regulated buildings, structures and applications.

Note 12

BSC proposes to correct the reference replacing Section 1.9.3, which does not exist in CBC, with the California Historical Building Code (Part 8, Title 24, California Code of Regulations), which regulates qualified historical buildings and structures in California.

Note 13

BSC proposes to revise the word “Health” to “Hospital” to align with the Office name change to the Office of Statewide Hospital Planning and Development.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 2

Chapter 2 DEFINITIONS

Chapter 3 OCCUPANCY CLASSIFICATION AND USE

Chapter 4 SPECIAL DETAILED REQUIREMENTS BASED ON OCCUPANCY AND USE

Chapter 5 GENERAL BUILDING HEIGHTS AND AREAS

Chapter 6 TYPES OF CONSTRUCTION

Chapter 7 FIRE AND SMOKE PROTECTION FEATURES

BSC proposes to adopt Chapters 2 through 7 of the 2024 IBC without amendments. This proposed action will ensure the adoption of the most recent edition of these chapters making them available for use throughout the state.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 3

Chapter 8 INTERIOR FINISHES

BSC proposes to adopt Chapter 8 of the 2024 IBC and bring forward existing amendment in Section 801.1 for scopes within BSC-CG authority listed in Section 1.2.2 from 2022 CBC to 2025 CBC without change.

This proposed action will ensure the adoption of the most recent edition of this chapter making it available for use throughout the state and keep pointers to direct the code user to appropriate sections of CALGreen.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 4

Chapter 9 FIRE PROTECTION AND LIFE SAFETY SYSTEMS

Chapter 10 MEANS OF EGRESS

BSC proposes to adopt Chapters 9 and 10 of the 2024 IBC without amendments. This proposed action will ensure the adoption of the most recent edition of these chapters making them available for use throughout the state.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 5

Chapter 11 ACCESSIBILITY

BSC proposes to NOT adopt Chapter 11 of the 2024 IBC as part of the model code adoption. Accessibility provisions are already promulgated by the agencies that have statutory authority to write the accessibility regulations within Title 24. The Department of Housing and Community Development promulgates the accessibility provisions in Chapter 11A, and the Division of the State Architect promulgates the accessibility provisions in Chapter 11B.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 6

Chapter 12 INTERIOR ENVIRONMENT

BSC proposes to adopt Chapter 12 of the 2024 IBC and bring forward existing amendments in Sections 1204.7 and 1204.7.1 for scopes within BSC's authority listed in Section 1.2.1 and in Sections 1204.6 and 1206.5 for scopes within BSC's authority listed in Section 1.2.2 from 2022 CBC to 2025 CBC without change.

This proposed action will ensure the adoption of the most recent edition of this chapter making it available for use throughout the state, keep providing standards for Campus lighting for parking facilities and primary walkways at California state universities, colleges and community colleges and keep pointers to direct the code user to appropriate sections of CALGreen.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 7

Chapter 13 ENERGY EFFICIENCY

BSC does not adopt IBC Chapter 13 of the 2024 IBC. The California Energy Commission promulgates the energy efficiency provisions for all occupancies in the California Energy Code (Part 6 of Title 24).

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 8

Chapter 14 EXTERIOR WALLS

BSC proposes to adopt Chapter 14 of the 2024 IBC and bring forward existing amendment in Section 1402.2.1 for scopes within BSC-CG authority listed in Section 1.2.2 from 2022 CBC to 2025 CBC without change.

This proposed action will ensure the adoption of the most recent edition of this chapter making it available for use throughout the state and keep pointers to direct the code user to appropriate sections of CALGreen.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 9

Chapter 15 ROOF ASSEMBLIES AND ROOF TOP STRUCTURES

BSC proposes to adopt Chapter 15 of the 2024 IBC and carry forward existing amendments in Section 1511.10 (formerly 1511.9) from 2022 CBC to 2025 CBC with the following modifications.

ITEM 9-1

Section 1511.10 Photovoltaic (PV) panel systems.

BSC proposes to renumber this section aligning with the model code renumbering and revise the language removing unnecessary duplications and clarifying requirements for manufacturer's instructions. This proposal has been coordinated with the Division of the State Architect (DSA), Department of Housing and Community Development (HCD) and

Office of State Hospital Planning and Development (OSHPD).

ITEM 9-2

Section 1511.10.1 Design (formerly 1511.9.1).

BSC proposes to renumber this section aligning with the model code renumbering, add BSC banner and revise the language clarifying requirements for the design of PV panel systems. This proposal has been coordinated with the Division of the State Architect (DSA), Department of Housing and Community Development (HCD) and Office of State Hospital Planning and Development (OSHPD).

During the 2021 Code Adoption Cycle, BSC's intention was to coadopt other agencies' amendment in 2022 CBC Section 1511.9.1 along with the amendment in 2022 CBC Section 1511.9. However, BSC banner, identifying BSC coadoption of Section 1511.9.1, was unintentionally omitted. BSC proposes to add the banner to the title of Section 1511.10.1 to correct this error.

The amendments proposed to the language of this section are editorial with no intended change in regulatory effect. The intent is to reformat the language making it easier to follow for the code user without making any material changes.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 10

Chapter 16 STRUCTURAL DESIGN

BSC proposes to adopt Chapter 16 of the 2024 IBC and bring forward existing amendments in Sections 1613.1.2 and 1613.1.3 from 2022 CBC to 2025 CBC without change.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 11

Chapter 17 SPECIAL INSPECTIONS AND TESTS

BSC proposes to adopt Chapter 17 of the 2024 IBC, bring forward existing amendment in Section 1707.1 from 2022 CBC to 2025 CBC without change. BSC proposes the following modification in Section 1704.2.3.

ITEM 11-1

Section 1704.2.3 Statement of special inspections.

BSC proposes to repeal the existing amendment, which clarified that Section 107.1 is in Chapter 1, Division II of CBC. This clarification amendment is not necessary anymore, as it is from the time IBC model Chapter 1 was printed in the CBC Appendix Chapter 1 in the

2007 edition of CBC and, for the first time, it was printed as Chapter 1, Division II in the 2010 edition of CBC.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 12

Chapter 18 SOILS AND FOUNDATIONS

Chapter 19 CONCRETE

Chapter 20 ALUMINUM

Chapter 21 MASONRY

Chapter 22 STEEL

Chapter 23 WOOD

Chapter 24 GLASS AND GLAZING

Chapter 25 GYPSUM BOARD, GYPSUM PANEL PRODUCTS AND PLASTER

Chapter 26 PLASTIC

BSC proposes to adopt Chapters 18 through 26 of the 2024 IBC without amendments.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 13

Chapter 27 ELECTRICAL

Chapter 28 MECHANICAL SYSTEMS

BSC does not adopt Chapters 27 and 28 of the 2024 IBC.

ITEM 14

Chapter 29 PLUMBING SYSTEMS

BSC does not adopt Chapter 29 of the 2024 IBC. BSC proposes to stop printing Chapter 29 and repeal existing amendments as shown below.

ITEM 14-1

Section 2901.1 Scope.

As Chapter 29 is proposed not to be printed in 2025 CBC, BSC proposes to repeal existing amendments that are no longer necessary.

Plumbing provisions adopted in California are located in the California Plumbing Code (Part 5 of Title 24) and based on the Uniform Plumbing Code published by the International Association of Plumbing and Mechanical Officials (IAPMO). By NOT printing IBC Chapter 29 in 2025 CBC, BSC is avoiding potential conflicts with existing regulations in other parts of Title 24.

The elimination of Chapter 29 provides clarity and regulatory consistency for the code user and is consistent with BSC's commitment to its mission and the public interest.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 15

Chapter 30 ELEVATORS AND CONVEYING SYSTEMS

BSC proposes to adopt Chapter 30 of the 2024 IBC without amendments.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 16

Chapter 31 SPECIAL CONSTRUCTION

BSC does not adopt Chapter 31 of the 2024 IBC. However, BSC proposes to carry forward existing statutory amendments to Chapter 31 in Section 3109.2 containing provisions of the California swimming pool safety act (statewide) with NOTE from 2022 CBC to 2025 CBC without change. BSC also proposes the following modifications in Section 3109.1.

ITEM 16-1

3109.1 General.

BSC proposes to replace reference to the International Swimming Pool and Spa Code (ISPSC) with the reference to "this code" as the ISPSC is not adopted in California and all the Swimming Pools and Spas installed in California shall meet standards of CBC and California laws.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 17

Chapter 32 ENCROACHMENT INTO THE PUBLIC RIGHT-OF-WAY

Chapter 33 SAFEGUARDS DURING CONSTRUCTION

Chapter 34 RESERVED

Chapter 35 REFERENCED STANDARDS

BSC proposes to adopt Chapters 32, 33 and 35 of the 2024 IBC without amendments. Chapter 34 is reserved in the 2024 IBC, so no action is needed.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

ITEM 18

Appendices A, B, C, D, E, F, G, H, I, J, K, L, M, N, O and P

BSC proposes not to adopt Appendices A, B, C, D, E, F, G, H, I, J, K, L, M, N, O and P of the 2024 IBC.

CAC Recommendation:

[Enter CAC recommendation(s), if any]

Agency Response:

[Enter the agency's response to CAC recommendation(s)]

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

Government Code Section 11346.2(b)(3) requires an identification of each technical, theoretical, and empirical study, report, or similar document, if any, upon which the agency relies in proposing the regulation(s).

There was no technical, theoretical or empirical study, report, or similar documents used as the basis for the proposed adoption of 2024 IBC with necessary amendments to become 2025 CBC. Health and Safety Code Section 18928 mandates this proposed action.

STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS

Government Code Section 11346.2(b)(1) requires a statement of the reasons why an agency believes any mandates for specific technologies or equipment or prescriptive standards are required.

Health and Safety Code Section 18928 requires the adoption of 2024 IBC, which contains prescriptive building standards, into the 2025 CBC. Prescriptive standards provide the following: explicit guidance for certain mandated requirements; consistent application and enforcement of building standards while also establishing clear design parameters; and ensure compliance with minimum health, safety and welfare standards for owners, occupants and guests. Performance standards are permitted by state law; however, they must be demonstrated to the satisfaction of the proper enforcing agency.

The proposed BSC amendments do not contain any mandates for specific technologies or equipment or prescriptive standards beyond the existing requirements already contained within 2022 CBC. The amendments are editorial to provide clarifications and eliminate conflicts with existing building standards.

CONSIDERATION OF REASONABLE ALTERNATIVES

Government Code Section 11346.2(b)(4)(A) requires a description of reasonable alternatives to the regulation and the agency's reasons for rejecting those alternatives. In the case of a regulation that would mandate the use of specific technologies or equipment or prescribe specific action or procedures, the imposition of performance standards shall be considered as an alternate. It is not the intent of this paragraph to require the agency to artificially construct alternatives or describe unreasonable alternatives.

BSC has not identified any reasonable alternatives, including less burdensome and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with statute.

BSC is required by statute to adopt model codes by reference in the California Building Standards Law (Health and Safety Code, Section 18901 et seq.). The proposed BSC amendments are editorial to provide clarifications and eliminate conflicts with existing building standards.

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

Government Code Section 11346.2(b)(4)(B) requires a description of any reasonable alternatives that have been identified or that have otherwise been identified and brought to the attention of the agency that would lessen any adverse impact on small business.

Adoption of the latest edition of the model code is mandated by HSC Section 18928. No alternatives were identified that would lessen any adverse impact on small business. Small businesses will not experience an adverse impact due to the proposed BSC amendments, which are editorial to provide clarifications and eliminate conflicts with existing building standards.

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

Government Code Section 11346.2(b)(5)(A) requires the facts, evidence, documents, testimony, or other evidence on which the agency relies to support an initial determination that the action will not have a significant adverse economic impact on business.

BSC has made an initial determination that this regulatory action would not have a significant adverse economic impact on California business enterprises and individuals, including the ability of California businesses to compete with businesses in other states.

BSC is adopting the latest edition of the model code pursuant to HSC Section 18928, making only minor amendments with no intended change in regulatory effect since these amendments are equivalent to current requirements in the Code.

Therefore, there are no other facts, evidence, documents, testimony, or other evidence on which the BSC relies to support its initial determination of no effect pursuant to Government Code Section 11346.2(b)(5)(A). The public is welcome to submit any information, facts, or documents either supporting BSC's initial determination or finding to the contrary.

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

Government Code Sections 11346.2(b)(2) and 11346.3(b)(1)

The California Building Standards Commission has assessed whether and to what extent this proposal will affect the following:

A. The creation or elimination of jobs within the State of California.

This regulation will not affect the creation or elimination of jobs within the State of California.

B. The creation of new businesses or the elimination of existing businesses within the State of California.

This regulation will not affect the creation of new businesses or elimination of existing businesses within the State of California.

C. The expansion of businesses currently doing business within the State of California.

This regulation will not affect the expansion of businesses currently doing business with the State of California

D. The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment.

These regulations will update and clarify minimum building standards and eliminate conflicts with existing building standards, which will provide clarity and regulatory consistency for the code user increasing protection of public health and safety, worker safety and the environment.

ESTIMATED COST OF COMPLIANCE, ESTIMATED POTENTIAL BENEFITS, AND RELATED ASSUMPTIONS USED FOR BUILDING STANDARDS

Government Code Section 11346.2(b)(5)(B)(i) states if a proposed regulation is a building standard, the initial statement of reasons shall include the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates.

Because this proposal makes only non-substantive, clarifying changes to existing code language resulting in no intended change in regulatory effect, BSC estimates there will be no additional cost for the regulated community to comply with these building standards. The benefits of this proposal include clarifying code language and eliminating conflicts with existing building standards that will produce sensible and usable state building standards that promote health and safety. BSC's assumption of no additional cost of compliance is based on the fact that the proposal preserves the existing status quo of the CEBC with no intended change in regulatory effect.

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

Government Code Section 11346.2(b)(6) requires a department, board, or commission within the Environmental Protection Agency, the Resources Agency, or the Office of the State Fire Marshal to describe its efforts, in connection with a proposed rulemaking action, to avoid unnecessary duplication or conflicts with federal regulations contained in the Code of Federal Regulations addressing the same issues. These agencies may adopt regulations different from these federal regulations upon a finding of one or more of the

following justifications: (A) The differing state regulations are authorized by law and/or (B) The cost of differing state regulations is justified by the benefit to human health, public safety, public welfare, or the environment.

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