

**INITIAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS
OF THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY
DEVELOPMENT
REGARDING THE 2025 CALIFORNIA BUILDING CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2
(HCD 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.

California Health and Safety Code (HSC), section 17921(a), directs the Department of Housing and Community Development (HCD) to propose adoption, amendment, or repeal of building standards for the protection and benefit of public health, safety, and general welfare. HCD has determined the proposed amendments herein, impacting the 2025 California Building Code (CBC) within the California Code of Regulations (CCR), Title 24, Part 2, are necessary to meet HCD's mandate in HSC, section 17922(a).

The 2025 CBC is based on the 2024 International Building Code (IBC), which will be effective on January 1, 2026. Specific rationale for this proposed rulemaking is provided within the respective items herein.

ITEM 1

Chapter 1, Scope and Administration, Division I, California Administration

HCD proposes to bring forward existing California amendments in Chapter 1, Division 1, from the 2022 California Building Code (CBC) for adoption into the 2025 CBC with modifications as follows:

Section 1.1.1 Title

Rationale: HCD proposes continued adoption of the above referenced section with modification. The proposed modification updates the reference to the IBC from the 2021 IBC to the 2024 IBC to comply with HCD's mandate in HSC, section 17922(a).

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 2

Chapter 1, Scope and Administration, Division II, Scope and Administration

HCD proposes to adopt Sections 105.2 (“Building” 1 – 13 only), 107.1, 107.2.1, 107.2.3, 107.2.4, 107.2.5, 107.2.6, 107.2.6.1, 107.2.7; 110.3.1, 110.3.2, 110.3.3, 110.3.4, 110.3.5, 110.3.6, 110.3.7, 110.3.8, 110.3.10, 110.3.11, 110.3.12, and 110.3.12.1 from the 2024 International Building Code (IBC) into the 2025 CBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 3

Chapter 2, Definitions

HCD proposes to adopt Chapter 2 from the 2024 IBC (except IBC definitions of “Accessible Unit”, “Common Use”, “Dwelling Unit, Efficiency”, “Intended To Be Occupied As A Residence”, “Lodging House”, “Multilevel Assembly Seating”, “Multistory Unit”, “Public-Use Areas”, “Self-Service Storage Facility”, “Type A Unit”, and “Type B Unit”) and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 4

Chapter 3, Occupancy Classification and Use

HCD proposes to adopt Chapter 3 from the 2024 IBC (except section 308.3) and bring forward existing California amendments from the 2022 CBC into the 2025 CBC with the following modifications:

Section 310.2 Residential Group R-1.

Rationale: HCD proposes to continue to adopt the above referenced model code section with existing amendments. HCD proposes to not adopt “Lodging Houses with more than five guestrooms” in the list of R-1 occupancies in section 310.2, from the 2024 IBC into the 2025 CBC. This section conflicts with the HCD existing definition of “*Lodging House*”. This model code addition also conflicts with an existing HCD amendment, section 310.4.1, which lists “Lodging houses” as an *R-3.1* occupancy. There is no intended change in regulatory effect.

Section 310.3 Residential Group R-2.

Rationale: HCD proposes to continue to adopt the above referenced model code section with existing amendments. HCD proposes to not adopt the new 2024 IBC condition, “...with more than five guest rooms”, to the existing R-2 occupancies, “Hotels” and “Motels”

(nontransient)", into the 2025 CBC. This conflicts with HCD's definition for "*Hotel or Motel*". There is no intended change in regulatory effect.

Section 310.4 Residential Group R-3.

Rationale: HCD proposes to continue to adopt the above referenced model code section with existing amendments. HCD proposes to not adopt the new 2024 IBC condition, "...with more than five guest rooms", to the existing R-3 occupancies, "Hotels" and "Motels (nontransient)", into the 2025 CBC. This conflicts with HCD's definition for "*Hotel or Motel*". There is no intended change in regulatory effect.

Section 310.4.2 Lodging houses.

Rationale: HCD proposes to remove the reference to the International Residential Code (IRC) and replace it with California Residential Code (CRC). HCD proposes to amend automatic sprinkler system installation requirements and replace "P2904" with a reference to CRC R309.1.1. There is no intended change in regulatory effect.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 5

Chapter 4, Special Detailed Requirements Based on Occupancy and Use

HCD proposes to adopt Chapter 4 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 6

Chapter 5, General Building Heights and Areas

HCD proposes to adopt Chapter 5 from the 2024 IBC (except Section 508.5, item 2, only) and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 7

Chapter 6, Types of Construction

HCD proposes to adopt Chapter 6 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 8

Chapter 7, Fire and Smoke Protection Features

HCD proposes to adopt Chapter 7 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 9

Chapter 7A [SFM], Materials and Construction Methods for Exterior Wildfire Exposure

HCD proposes to adopt Chapter 7A (“Note” only) into the 2025 CBC.

Rationale: HCD proposes to coadopt a pointer with the Office of the State Fire Marshal to redirect code users to new Part 7 for Materials and Construction Methods for Exterior Wildlife Exposure provisions. There is no intended change in regulatory effect.

CAC Recommendation:

TBD

Agency Response:

ITEM 10

Chapter 8, Interior Finishes

HCD proposes to adopt Chapter 8 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 11

Chapter 9, Fire Protection and Life Safety Systems

HCD proposes to adopt Chapter 9 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC and new amendments into the 2025 CBC with the following modifications:

Section 915.4.4 Interconnection.

Section 915.4.4 [formerly 915.4.5] Interconnection.

Rationale: HCD proposes to not adopt the above referenced new 2024 IBC section, 915.4.4 “Interconnection.” HCD further proposes to continue adoption of the above referenced existing California amendment, 915.4.5 “*Interconnection*”, with modification (renumbering). The 2024 IBC has copied portions of this California amendment, section 915.4.5 “*Interconnection*”, but left out the majority of the information in the California amendment. By continuing to adopt the existing California amendment, all the requirements and exceptions will be available for the code user. This amendment provides clarity and consistency for implementation and enforcement. There is no intended change in regulatory effect.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 12

Chapter 10, Means of Egress

HCD proposes to adopt Chapter 10 from the 2024 IBC (except Section 1009.2.2) and bring forward existing California amendments from the 2022 CBC into the 2025 CBC with the following modifications:

SECTION 1010 DOORS, GATES AND TURNSTILES

1010.1.1 Size of doors.

Rationale: HCD proposes to continue the adoption of the above referenced section with new and existing California amendments. The existing amendments removed IBC references to “Type A” and “Type B” units since California does not currently differentiate among types of dwelling units.

HCD proposes to continue to not adopt 2021 IBC exception (9), renumbered in 2024 IBC to exception (7). This exception allows minimum clear width of 31.75 inches for door openings required to be accessible within Type B units. This exception conflicts with the California accessibility provisions in Chapter 11A, which requires the minimum clear width of door openings in all covered dwelling units to be 32 inches. The existing amendments have been brought forward from the 2022 CBC for adoption into the 2025 CBC. There is no intended change in regulatory effect.

HCD proposes to repeal the previous amendment to the 2024 IBC exception 8, renumbered in 2025 CBC to exception 7 and delete the word “nonadaptable”. Furthermore, in coordination with the Division of the State Architect (DSA), HCD proposes to clarify that the exception does not apply to doors intended to be used by people with disabilities.

HCD also proposes to amend 2024 IBC exception 9, renumbered in the 2025 CBC to exception 8, and change the section reference from 421.4.2 of the International Plumbing Code to Section 408.6 of the California Plumbing Code. The International Plumbing Code is not adopted in California, and the appropriate section that has the

requirements for doors serving shower compartments in the 2025 CPC is Section 408.6 “Finished Curb or Threshold”. This section was previously Section 408.5 “Finished Curb or Threshold” in the 2022 CPC, due to model code renumbering. The model Code for the California Plumbing Code is the Uniform Plumbing Code. There is no intended change in regulatory effect.

1010.2.3 Hardware height.

Rationale: HCD proposes to adopt the above referenced section with a new California amendment repealing the model code reference to the International Swimming Pool and Spa Code, which HCD does not adopt. There is no intended change in regulatory effect.

SECTION 1011 STAIRWAYS

1011.5.2 Riser height and tread depth

Rationale: In coordination with DSA, HCD proposes to continue the adoption of the above referenced section with a new California amendment. HCD proposes to remove the IBC reference to “Type A” units since California does not currently differentiate among types of dwelling units, and clarify that the height riser and tread depth requirements in this section exclude the stairs intended to be used by people with disabilities. There is no intended change in regulatory effect.

SECTION 1014 HANDRAILS

1014.5 Continuity.

Rationale: HCD proposes to continue to adopt the above referenced section with a new California amendment. HCD proposes to remove the 2024 IBC reference to “Type A units”, as California does not currently differentiate among types of dwelling units. There is no intended change in regulatory effect.

SECTION 1015 GUARDS

1015.3 Height

Rationale: HCD proposes to continue to adopt the above referenced section with new and existing California amendments. HCD proposes continued non-adoption of existing model code Exception 1, and non-adoption of new Exception 2. These exceptions permit a 36-inch guard for Group R-3 occupancies and individual dwelling units within Group R-2 occupancies not more than three stories above grade. There is no intended change in regulatory effect.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 13

Chapter 11, Reserved

HCD proposes to not adopt Chapter 11 from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 14

Chapter 11A, Housing Accessibility

HCD proposes to continue to adopt Chapter 11A from the 2022 CBC into the 2025 CBC with modifications as specified in separate housing accessibility rulemaking rationale.

Rationale: Chapter 11A is addressed by a separate rulemaking.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 15

Chapter 11B, Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Public Housing

HCD proposes to not adopt Chapter 11B from the 2022 CBC.

Rationale: DSA regulates provisions of Chapter 11B. HCD does not have authority over the application of Chapter 11B.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 16

Chapter 12, Interior Environment

HCD proposes to adopt Chapter 12 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC with the following modifications:

SECTION 1202 - VENTILATION

Section 1202.3 Unvented attic and unvented enclosed rafter assemblies.

Rationale: HCD proposes to repeal California amendment in the above referenced section, subitem 4.1. The 2019 CRC subitems 4.1 and 5.1 in section R806.5, were repealed in the 2021 triennial code cycle. The 2022 CBC subitems 4.1 and 5.1 in section 1202.3, have the same text as 2019 CRC section R806.5. 2022 CBC subitem 5.1 was repealed in the 2022 intervening code cycle, but HCD failed to repeal subitem 4.1. Repeal of CBC subitem section 4.1 will maintain consistency between the CBC and the CRC.

SECTION 1212 [formerly 1211] [HCD 1 & HCD 2] GARAGE DOOR SPRINGS

1212.1 [formerly 1211.1] General.

1212.1.1 [formerly 1211.1.1] Garage door extension springs.

1212.2 [formerly 1211.2] Design standards.

1212.3 [formerly 1211.3] Certification.

1212.4 [formerly 1211.4] Restraining devices.

1212.5 [formerly 1211.5] Identification.

1212.6 [formerly 1211.6] Installation.

SECTION 1213 [formerly 1212] [HCD 1] POLLUTANT CONTROL

1213.1 [formerly 1212.1] Finish material pollutant control.

Rationale: HCD proposes to renumber the above referenced California amendments due to IBC renumbering. The existing California amendments were in the 2022 CBC and are proposed to be renumbered in the 2025 CBC. There is no intended change in regulatory effect.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 17

Chapter 13, Energy Efficiency

HCD proposes to not adopt Chapter 13 from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 18

Chapter 14, Exterior Walls

HCD proposes to adopt Chapter 14 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 19

Chapter 15, Roof Assemblies and Rooftop Structures

HCD proposes to adopt Chapter 15 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC with the following modifications:

1511.9.6 Accessibility and egress.

Rationale: HCD proposes to adopt the above referenced section with amendment. HCD in coordination with DSA are proposing to add reference to Chapters 11A and 11B. HCD does not adopt Chapter 11B. There is no intended change in regulatory effect.

1511.10 [formerly 1511.9] Photovoltaic (PV) panel systems. [HCD 1 & HCD 2]

1511.10.1 [formerly 1511.9.1] Design. [HCD 1 & HCD 2]

Rationale: HCD proposes to continue to adopt the above referenced California amendments with modifications (renumbering and re-formatting). HCD proposes to renumber the above referenced California amendments due to IBC renumbering. HCD further proposes, in coordination with DSA, Building Standards Commission (BSC), and Office of Statewide Hospital Planning and Development (OSHPD), to re-format these amendments and add language clarifying the requirements for the design of PV panel systems, and to rename section 1511.10.1 to “*Design*.” The amendments proposed to the language of this section are editorial only. There is no intended change in regulatory effect.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 20

Chapter 16, Structural Design

HCD proposes to adopt Chapter 16 from the 2024 IBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 21

Chapter 17, Special Inspections and Tests

HCD proposes to adopt Chapter 17 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 22

Chapter 18, Soils and Foundations

HCD proposes to adopt Chapter 18 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 23

Chapter 18A, Soils and Foundations

HCD proposes to not adopt Chapter 18A from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 24

Chapter 19, Concrete

HCD proposes to adopt Chapter 19 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC with the following modifications:

Section 1907.4.1 [formerly 1907.1.1] Capillary break. [HCD 1]

Rationale: HCD proposes to renumber the above referenced California amendment due to IBC renumbering. This existing California amendment was in section 1907.1.1 of the 2022 CBC and is proposed to be renumbered to section 1907.4.1 in the 2025 CBC. There is no intended change in regulatory effect.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 25

Chapter 19A, Concrete

HCD proposes to not adopt Chapter 19A from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 26

Chapter 20, Aluminum

HCD proposes to adopt Chapter 20 from the 2024 IBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 27

Chapter 21, Masonry

HCD proposes to adopt Chapter 21 from the 2024 IBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 28

Chapter 21A, Masonry

HCD proposes to not adopt Chapter 21A from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 29

Chapter 22, Steel

HCD proposes to adopt Chapter 22 from the 2024 IBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 30

Chapter 22A, Steel

HCD proposes to not adopt Chapter 22A from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 31
Chapter 23, Wood

HCD proposes to adopt Chapter 23 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 32
Chapter 24, Glass and Glazing

HCD proposes to adopt Chapter 24 from the 2024 IBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 33
Chapter 25, Gypsum Panel Products and Plaster

HCD proposes to adopt Chapter 25 from the 2024 IBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 34
Chapter 26, Plastic

HCD proposes to adopt Chapter 26 from the 2024 IBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 35
Chapter 27, Electrical

HCD proposes to not adopt Chapter 27 from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 36

Chapter 28, Mechanical Systems

HCD proposes to not adopt Chapter 28 from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 37

Chapter 29, Plumbing Systems

HCD proposes to not adopt Chapter 29 from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 38

Chapter 30, Elevators and Conveying Systems

HCD proposes to adopt Chapter 30, (Section 3001.4 only) from the 2024 IBC and bring forward existing California amendment from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 39

Chapter 31, Special Construction

HCD proposes to adopt Chapter 31 from the 2024 IBC, (except Sections 3109 and 3113) and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 40

Chapter 31A, Systems for Window Cleaning or Exterior Building Maintenance

HCD proposes to not adopt Chapter 31A from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 41

Chapter 31B, Public Pools

HCD proposes to continue to adopt Chapter 31B (Sections 3101B and 3102B only) from the 2022 CBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 42

Chapter 31C [DPH], Radiation

HCD proposes to not adopt Chapter 31C from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 43

Chapter 31D [DPH], Food Establishments

HCD proposes to not adopt Chapter 31D from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 44

Chapter 31E, Reserved

HCD proposes to not adopt Chapter 31E from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 45

Chapter 31F [SLC], Marine Oil Terminals

HCD proposes to not adopt Chapter 31F from the 2022 CBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 46

Chapter 32, Encroachments into The Public Right of Way

HCD proposes to adopt Chapter 32 from the 2024 IBC into the 2025 CBC without amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 47

Chapter 33, Safeguards During Construction

HCD proposes to adopt Chapter 33, (Sections 3301-3308 and 3310 only) from the 2024 IBC into the 2025 CBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 48

Chapter 34, Reserved

HCD proposes not to adopt Chapter 34 from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 49

Chapter 35, Referenced Standards

HCD proposes to adopt Chapter 35 from the 2024 IBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 50

Appendix A, Employee Qualifications

HCD proposes to not adopt Appendix A from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 51

Appendix B, Board of Appeals

HCD proposes to not adopt Appendix B from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 52

Appendix C, Group U—Agricultural Buildings

HCD proposes to not adopt Appendix C from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 53

Appendix D, Fire Districts

HCD proposes to not adopt Appendix D from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 54

Appendix E, Supplementary Accessibility Requirements

HCD proposes to continue to not adopt Appendix E from the 2024 IBC. HCD proposes that Appendix E not be printed in the 2025 CBC. HCD adopts housing accessibility regulations in Chapter 11A.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 55

Appendix F, Rodentproofing

HCD proposes to not adopt Appendix F from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 56

Appendix G, Flood-Resistant Construction

HCD proposes to not adopt Appendix G from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 57

Appendix H, Signs

HCD proposes to not adopt Appendix H from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 58

Appendix I, Patio Covers

HCD proposes to adopt Appendix I from the 2024 IBC into the 2025 CBC without

amendment.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 59

Appendix J, Grading

HCD proposes to adopt Appendix J from the 2024 IBC into the 2025 CBC and bring forward existing California amendments from the 2022 CBC into the 2025 CBC without modification.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 60

Appendix K, Administrative Provisions

HCD proposes to not adopt Appendix K from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 61

Appendix L, Earthquake Recording Instrumentation

HCD proposes to not adopt Appendix L from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 62

Appendix M, Tsunami-Generated Flood Hazards

HCD proposes to not adopt Appendix M from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 63
Appendix N, Replicable Buildings

HCD proposes to not adopt Appendix N from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 64
Appendix O, Performance-Based Application

HCD proposes to not adopt Appendix O from the 2024 IBC.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 65
Appendix P, Sleeping Lofts

HCD proposes to adopt Appendix P from the 2024 IBC into the 2025 CBC with the following amendments:

SECTION P105 – SMOKE ALARMS

P.105.1 General.

Rationale: HCD proposes to adopt the above referenced section with amendment. HCD proposes to change the smoke alarms compliance reference from “UL 217” to “*Section 907.2.11*”, as the applicable code.

SECTION P106 – REFERENCE STANDARDS

P.106.1 General.

Rationale: HCD proposes to adopt the above referenced section with amendments. HCD proposes to reserve Section P106 Referenced Standards for future use and repeal Section P.106.1 and Table P106.1.

CAC Recommendation:

TBD

Agency Response:

TBD

ITEM 66
Appendix Q, Emergency Housing

HCD proposes to continue to adopt *Appendix Q* [formerly Appendix P] from the 2022 CBC into the 2025 CBC with the following modifications.

Rationale: HCD proposes to continue to adopt the above referenced Appendix with modification. HCD proposes to amend *Appendix P, Emergency Housing* to *Appendix Q, Emergency Housing*, due to the adoption of new model code Appendix P Sleeping Lofts.

CAC Recommendation:

TBD

Agency Response:

TBD

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).

2024 IBC

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.

HSC Section 17922 requires HCD to adopt by reference model building codes, e.g., IBC, which contains prescriptive standards. 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.

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.

None. There were no alternatives available to HCD. HCD is required by statute to adopt this model code by reference. The proposed amendments are the only reasonable alternative for clarifying the 2025 CBC.

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.

HCD is required by statute to adopt this model code by reference, however, HCD also has authority to propose additions and deletions to the model code pursuant to HSC Section 17922.

FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE 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.

HCD did not identify any facts, evidence, documents, testimony, or other substantiation to make an initial determination of significant adverse economic impact on businesses. HCD has determined 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.

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 Department of Housing and Community Development 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.

These regulations will not affect the creation, or cause the 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.

These regulations will not affect the creation of new businesses or the elimination of existing business within the State of California.

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

These regulations will not affect the expansion of businesses currently doing business within 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.

The adoption of the 2024 IBC through incorporation by reference with California amendments will provide stakeholders with a code establishing minimum requirements for building systems using prescriptive and performance-related provisions. It is founded on broad-based principles that make possible the use of new materials and new building designs due to California's adoption of the Uniform Plumbing Code, Uniform Mechanical Code, California Energy Code and National Electrical Code, chapters in the IBC addressing these subjects are not adopted. These regulations will also update and improve minimum existing building standards, which will provide increased 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.

- No increased cost of compliance for those regulations that make only technical and nonsubstantive changes.
- Government Code Section 11346.2(b)(5)(B)(ii) provides that the model codes adopted pursuant to HSC Section 18928 shall be exempt from the requirements of Government Code Section 11346.2(b)(5)(B) unless upon request, as specified. The purpose of this rulemaking is to adopt the 2024 IBC which is a model code setting forth requirements for building systems in structures.
- The potential benefits provide clarity for the code users and local enforcing agencies.
- As noted in Section D (Benefits of the Regulation), benefits include protection of public health and safety, worker safety, and the environment.

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 regulations do not duplicate nor conflict with federal regulations. The State of California has preemptive authority to adopt more restrictive mandatory standards for the construction methods and materials addressed in these regulations.