

**FINAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE DEPARTMENT OF HEALTH CARE ACCESS AND INFORMATION/  
OFFICE OF STATEWIDE HOSPITAL PLANNING AND DEVELOPMENT  
REGARDING THE 2025 CALIFORNIA BUILDING CODE,  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2 VOLUME 2  
(OSHPD 05/24)**

The Administrative Procedure Act requires that every agency shall maintain a file of each rulemaking that shall be deemed to be the record for that rulemaking proceeding. The rulemaking file shall include a Final Statement of Reasons. The Final Statement of Reasons shall be available to the public upon request when rulemaking action is being undertaken. The following are the reasons for proposing this particular rulemaking action:

**UPDATES TO THE INITIAL STATEMENT OF REASONS:**

Government Code Section 11346.9(a)(1) requires an update of the information contained in the Initial Statement of Reasons. If the update identifies any data or any technical, theoretical or empirical study, report, or similar document on which the state agency is relying that was not identified in the Initial Statement of Reasons, the state agency shall comply with Government Code Section 11347.1.

The Department of Health Care Access and Information (HCAI)/Office of Statewide Hospital Planning and Development (OSHPD) has not added any data (including technical, theoretical, or empirical studies, reports, or similar documents relied upon) that would necessitate an update of the information contained in the Initial Statement of Reasons.

**MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS**

Pursuant to Government Code Section 11346.9(a)(2), if the determination as to whether the proposed action would impose a mandate, the agency shall state whether the mandate is reimbursable pursuant to Part 7 of Division 4. If the agency finds that the mandate is not reimbursable, it shall state the reasons for the finding(s).

HCAI has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts.

HCAI does not have authority to propose regulations that would impact local agencies or school districts.

**OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATION(S).**

Government Code Section 11346.9(a)(3) requires a summary of EACH objection or recommendation regarding the specific adoption, amendment, or repeal proposed, and an explanation of how the proposed action was changed to accommodate each objection or recommendation, or the reasons for making no change. This requirement applies only to objections or recommendations specifically directed at the agency's proposed action or to the procedures followed by the agency in proposing or adopting the action, or reasons for

making no change. Irrelevant or repetitive comments may be aggregated and summarized as a group.

The text with proposed changes was made available to the public for a 45-day comment period from September 6, 2024 until October 21, 2024. HCAI received two comments during the 45-day comment period. After the 45-day comment period, HCAI and the Division of the State Architect coordinated additional changes to Item 2, Section 1413 that went out for a 15-day comment period. The text with proposed changes was made available to the public from November 6, 2024 until November 21, 2024. HCAI received two comments during the 15-day comment period.

## **COMMENTS RECEIVED DURING THE 45-DAY COMMENT PERIOD**

### **ITEM - MULTIPLE**

#### **Commenter(s) and Recommendation:**

Mia Marvell, Supervisor of the Building Standards Unit at HCAI recommends amending the language to include “Department of Health Care Access and Information (HCAI)” to clarify that HCAI is the enforcing agency.

#### **Agency Response:**

In response to the comment, HCAI determined the requested changes are non-substantive and amended the language in Final Express Terms adding “Department of Health Care Access and Information” to clarify that HCAI is the enforcing agency in the Sections listed below:

- 1601.1.1 Application #2**
- 1601A.1.1 Application #2**
- 1701.1.1 Application.**
- 1701A.1.1 Application #2.**
- 1801.1.1 Application.**
- 1801A.1.1 Application #2.**
- Section 1901.1.1 Application #2.**
- Section 1901A.1.1 Application #2.**
- Section 2001.1.1 Application #1.**
- Section 2101.1.1 Application #2.**
- Section 2101A.1.1 Application #2.**
- Section 2201.1.1 Application #1.**
- Section 2201A.1.1 Application #2.**
- Section 2301.1.1 Application #2.**
- Section 2401.1.1 Application #1.**
- Section 2501.1.1 Application #1.**

## ITEM 19

### CHAPTER 25 GYPSUM PANEL PRODUCTS AND PLASTER

#### Commenter(s) and Recommendation:

**Section 2507.3.** Brian Stanley, Architectural Specialist, Technical Services Information Bureau recommends amending Section 2507.3 Lath attachment to horizontal wood supports. Mr. Stanley states that No. 9 W&M gage minimum screws are not available. He also recommends removing the screw length and points to ASTM C106.

#### Agency Response:

In response to the comment HCAI coordinated with the Division of the State Architect, amended Section 2507.3 and conducted a 15-day comment period.

### COMMENTS RECEIVED DURING THE 15-DAY COMMENT PERIOD

## ITEM 19

### CHAPTER 25 GYPSUM PANEL PRODUCTS AND PLASTER

#### Commenter(s) and Recommendation:

**Section 2507.3.** Brian Stanley, Architectural Specialist, Technical Services Information Bureau recommends amending Section 2507.3. Mr. Stanley states that No. 8 wood screws in accordance with ANSI B18.6.1 should be more consistent with the building code that references ASTM C1861 for lath. He also recommends removing the 1-inch diameter washer when a No. 8 wood screw is used and recommends clarification of the placement for earthquake staples. Mr. Stanley offered to work with the agencies to propose further clarifications during the next code cycle.

#### Agency Response:

HCAI coordinated with DSA and has decided not to accept the 15-day public comment. The ANSI reference standard is needed to define the wood screws for the additional option proposed in Item 2 of this section. HCAI intends to study the recommendations and consider modifications in a future code cycle. Therefore, this item continues unchanged from the 15-day Express Terms version.

## ITEM - MULTIPLE

#### Commenter(s) and Recommendation:

Michael Gross, P.E, G.E, Vice President Youngdahl Consulting Group, Inc provided several recommendations listed below:

**Section 1705.6.1.** Mr. Gross recommends adopting Section 1705.6.1.

**Section 1806.3.4.** Mr. Gross recommends amending the section.

**Section 1807.2.3.** Mr. Gross recommends amending the section.

#### Agency Response:

**Section 1705.6.1.** HCAI currently amends and adopts this section.

**Section 1806.3.4.** HCAI thanks Mr. Gross for providing amendments and participating in the rulemaking process. HCAI did not propose any changes to this section during the 45-day or 15-day comment periods, so additional amendments cannot be considered at this time.

**Section 1807.2.3** HCAI thanks Mr. Gross for providing amendments and participating in the rulemaking process. HCAI did not propose any changes to this section during the 45-day or 15-day comment periods, so additional amendments cannot be considered at this time.

## **DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS**

Government Code Section 11346.9(a)(4) requires a determination with supporting information that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed, or would be as effective and less burdensome to affected private persons than the adopted regulation, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

HCAI has determined that no alternative would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective and less burdensome to affected private persons than the adopted regulation. The proposed regulations will not have a cost impact to private persons.

## **REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:**

Government Code Section 11346.9(a)(5) requires an explanation setting forth the reasons for rejecting any proposed alternatives that would lessen the adverse economic impact on small businesses, including the benefits of the proposed regulation per 11346.5(a)(3).

HCAI has determined that the proposed regulations will not have an adverse economic impact on small businesses. The proposed regulations are technical modifications that will provide clarification and consistency within the code.