



# MEMORANDUM

---

Date: December 17, 2024

To: Stoyan Bumbalov, Executive Director  
Department of General Services  
California Building Standards Commission

From: Woo Cheong, Associate Architect  
Department of General Services  
California Building Standards Commission

Subject: **BSC 01/24-CWoRE - 2025 CALIFORNIA BUILDING CODE and 2025 CALIFORNIA RESIDENTIAL CODE**

The California Building Standards Commission (BSC) is proposing a “change without regulatory effect” to the 2025 California Building Code, Chapter 31, Section 3109.2, and the 2025 California Residential Code, Appendix CI, Section CI100.

Note: Appendix AX, Section AX100 in 2022 CRC will be re-lettered to Appendix CI, Section CI100 in 2025 CRC consistent with the 2024 IRC and HCD proposal.

The changes are based on the enactment of AB 2866 (Chapter 745, Statutes of 2024) and SB 552 (Chapter 769, Statutes of 2024), which become effective January 1, 2025. These bills made amendments to the Swimming Pool Safety Act (Health and Safety Code (HSC) Section 115920 – 115929)—which is required to be published in Title 24 pursuant to HSC Section 18942(b).

This proposed change meets the requirements of the Administrative Procedure Act, Building Standards Law, and the California Administrative Code, Section 1-421(c), Item 6, for a “change without regulatory effect,” which includes the following:

6. Making a regulatory provision consistent with a changed California statute if both of the following conditions are met:
  - (A) The regulatory provision is inconsistent with and superseded by the changed statute, and
  - (B) The state adopting agency or state proposing agency has no discretion to adopt a change which differs in substance from the one chosen.

If you have any questions regarding this submittal, please contact me at (279) 799-4250 or [woo.cheong@dgs.ca.gov](mailto:woo.cheong@dgs.ca.gov).

Enclosure