

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE DIVISION OF THE STATE ARCHITECT-STRUCTURAL SAFETY  
REGARDING THE 2025 CALIFORNIA PLUMBING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 5  
(DSA-SS 02/24)**

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.

The Division of the State Architect – Structural Safety (DSA-SS) proposes to repeal the 2021 edition of the Uniform Plumbing Code (UPC) and adopt the 2024 edition of the UPC, published by the International Association of Plumbing and Mechanical Officials, for codification and effectiveness as the 2025 California Plumbing Code (CPC). DSA-SS proposes this action in order to comply with state law requiring state agencies to adopt the latest edition model code within one year of the publication date.

Building standards proposed by DSA-SS for adoption would be applicable to public elementary and secondary schools, community colleges, and state-owned or state-leased essential services buildings.

**ITEM 1**

**Chapter 1, ADMINISTRATION**

DSA proposes to bring forward existing California amendments in Chapter 1, Division I from the 2022 California Plumbing Code for adoption into the 2025 edition of the California Plumbing Code (CPC) with the following amendments:

**ITEM 1-1**

**Section 1.1.1 Title**

DSA proposes to update the general title statement reflecting adoption of the 2024 Uniform Plumbing Code, the most recent edition of the model code. Additionally, BSC proposes to carry forward existing amendments in Chapter 1, Division I.

Updating the edition of the model code referenced is required to meet Building Standards Law regarding the adoption of the most recent edition of model code within one year of the model code publication. 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.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 2**

**Chapter 2, DEFINITIONS**

DSA-SS proposes to adopt Chapter 2 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 3**

**Chapter 3, General Regulations**

DSA-SS proposes to adopt Chapter 3 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4**

**Chapter 4, Plumbing Fixtures and Fixture Fittings**

DSA-SS proposes to adopt the 2024 UPC Chapter 4 and to carry forward existing California amendments and as itemized into the 2025 CPC with new editorial modifications and renumbered sections shown below, as model code numbering sequence has changed as follows: 408.2.1 to 408.3.1, 408.2.2 to 408.3.2. Included in the amendments are changes early adopted for the 2022 CPC Supplements relating to all-gender multi-user restroom facilities. Model code verbiage adopted after the 2022 CPC supplements is less stringent. DSA-SS is proposing to carry forward California amendments.

**ITEM 4-1**

**Section 408.3 Water Consumption**

DSA-SS is proposing to modify the GPM for body sprays to align with the Appliance Efficiency regulations adopted by the CEC in Title 20 of the California Code of Regulations.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-2**

**Section 408.3.1 & 408.3.2 Single Showerhead & Multiple Showheads Serving one Shower**

DSA-SS is proposing to renumber Sections 408.2.1 to 408.3.1 and 408.2.2 to 408.3.2. to align with UPC renumbering.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-3**

**Section 420.2.1 Kitchen Faucets**

DSA-SS is proposing to add the metric pressure equivalent measurements.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-4**

**Section 420.3.1 Pre-Rinse Spray Valves**

DSA-SS is proposing to repeal an existing California amendment to Pre-Rinse Spray Valves. In 2019 Intervening Code Cycle HCD, DSA, CEC and BSC coordinated and adopted this subsection to align with the Appliance Efficiency regulations adopted by the CEC in Title 20 of the California Code of Regulations. On January 28, 2019, the amended federal standards for all commercial pre-rinse spray valves went into effect (Title 10, Code of Federal Regulations, section 431, subpart O). The federal standards for flow rates of commercial pre-rinse spray valves manufactured on or after January 28, 2019, shall be equal to or less than the values shown in Table 420.3 (same as Table H-2 found in Title 20, California Code of Regulations). 2024 Uniform Plumbing Code adopted the federal language which allows BSC to repeal referenced Table H-2 and adopt model code.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-5**

**Sections 422.1.1 Fixture Calculations and, 422.1.1.1 All Gender Fixture Calculations**

DSA-SS proposes to repeal a portion of Section 422.1.1 Fixture Calculations adopted for the 2022 CPC supplement relating to all-gender multi-user facilities and relocate other adopted verbiage relating to the allowance of a substitution of a water closet for a urinal to the end of the section.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-6**

**Sections 422.2 Separate Facilities**

DSA-SS proposes to amend exception 4, with verbiage similar to the more stringent requirements adopted for the 2022 CBC Supplements.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-7**

**Section 422.6 Water Closet Compartment**

DSA-SS proposes to adopt Section 422.6 but amend to add a third exception prohibiting the use of a less restrictive national standard for privacy compartments and require the more restrictive verbiage for privacy compartments adopted for the 2022 CPC Supplements. The model code regulations and standards are less restrictive than those adopted by DSA during the 2022 Intervening cycle. A definition of privacy compartment was added to the 2022 supplement to provide clarity regarding privacy compartments in all-gender multi-user restrooms.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-8**

**Section 422.7 Urinal Partitions**

DSA-SS proposes to adopt Section 422.7 but amend to add a third exception prohibiting the use of a less restrictive national standard for privacy compartments and require the more restrictive verbiage for privacy compartments adopted for the 2022 CPC Supplements. The model code regulations and standards are less restrictive than those adopted by DSA during the 2022 Intervening cycle. A definition of privacy compartment was added to the 2022 supplement to provide clarity regarding privacy compartments in all-gender multi-user restrooms.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 4-9**  
**TABLE 422.1 MINIMUM PLUMBING FACILITIES**

In coordination with HCD, BSC, OSHPD, DSA-SS proposes to restore a missing footnote that was inadvertently omitted during codification of the 2022 CPC. BSC proposes to renumber the footnote from 6 to 8 to accommodate new model code footnotes added.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 5**  
**Chapter 5, Water Heaters**

DSA-SS proposes to adopt Chapter 5 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 6**  
**Chapter 6, Water Supply and Distribution**

DSA-SS proposes to adopt Chapter 6 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 7**  
**Chapter 7, Sanitary Drainage**

DSA-SS proposes to adopt Chapter 7 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 8**  
**Chapter 8, Indirect Wastes**

DSA-SS proposes to adopt Chapter 8 of the 2024 UPC into the 2025 edition of the CPC

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without amendment.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 9**

**Chapter 9, Vents**

DSA-SS proposes to adopt Chapter 9 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 10**

**Chapter 10, Traps and Interceptors**

DSA-SS proposes to adopt Chapter 10 of the 2024 UPC into the 2025 edition of the CPC without amendment.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 11**

**Chapter 11, Storm Drainage**

DSA-SS proposes to adopt Chapter 11 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 12**

**Chapter 12, Fuel Gas Piping**

DSA-SS proposes to adopt Chapter 12 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 13**

**Chapter 13 Health Care Facilities and Medical Gas and Medical Vacuum Systems,  
Chapter 14 Firestop Protection,  
Chapter 15 Alternate Water Sources for Nonpotable Applications,  
Chapter 16 Nonpotable Rainwater Catchment Systems**

DSA proposes to not adopt Chapter 13 of the 2024 UPC into the 2025 CPC. This chapter is adopted by the Office of the State Fire Marshal (for fire and panic safety) and amended by the Office of Statewide Health Planning and Development.

DSA proposes to not adopt Chapter 14 of the 2024 UPC into the 2025 CPC. This is under the authority of the State Fire Marshal.

DSA proposes to not adopt Chapters 15 and 16 of the 2024 UPC. DSA did not adopt Chapters 15 and 16 in the 2021 edition of the UPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 14**

**Chapter 17, Referenced Standards**

DSA-SS proposes to adopt Chapter 17 of the 2024 UPC with existing DSA-SS adopted California amendments carried forward into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 15**

**Appendix A, Recommended Rules for Sizing the Water Supply System**

DSA-SS proposes to adopt Appendix A of the 2024 UPC into the 2025 edition of the CPC without amendment.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 16**

**Appendix B, Explanatory Notes on Combination Waste and Vent Systems**

DSA-SS proposes to adopt Appendix B of the 2024 UPC into the 2025 edition of the CPC

without amendment.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 17**

**Appendix C, Alternate Plumbing Systems**

DSA-SS proposes to not adopt Appendix C of the 2024 UPC into the 2025 edition of the CPC. DSA-SS did not adopt Appendix C in the 2021 UPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 18**

**Appendix D, Sizing Storm Water Drainage Systems**

DSA-SS proposes to adopt Appendix D of the 2024 UPC into the 2025 edition of the CPC without amendment.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 19**

**Appendix E, Manufactured/Mobile Home Parks and Recreational Vehicle Parks, Appendix F, Firefighter Breathing Air Replenishment Systems, and Appendix G, Sizing of Venting Systems**

DSA-SS proposes to not adopt Appendices E, F, and G of the 2024 UPC into the 2025 edition of the CPC. DSA-SS did not adopt Appendices E, F, and G in the 2021 UPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 20**

**Appendix H, Private Sewage Disposal Systems**

DSA-SS proposes to adopt Appendix H of the 2024 UPC into the 2025 edition of the CPC without amendment.



**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 21**

**Appendix I, Installation Standard for PEX Tubing Systems for Hot and Cold Water Distribution**

DSA-SS proposes to continue adoption of Appendix Chapter I, IAPMO IS 31-2022 only of the 2024 UPC without amendments into the 2025 CPC, and not adopt new 2024 UPC Appendix sections IAPMO IS 26-2019e2, IAPMO IS 33-2019e1 and TCNA.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 22**

**Appendix J, Combination of Indoor and Outdoor Combustion and Ventilation Opening Design, Appendix K, Potable Rainwater Catchment Systems, Appendix L, Sustainable Practices, and Appendix M, Peak Water Demand Calculator**

DSA-SS proposes to not adopt Appendix J, K, L, and M of the 2024 UPC into the 2025 edition of the CPC. DSA did not adopt Appendices J, K, L and M in the 2021 UPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 23**

**Appendix N - Impact of Water Temperature on the Potential for Scalding and Legionella Growth**

DSA-SS proposes to adopt Appendix N of the 2024 UPC into the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**ITEM 24**

**Appendices O - Non-Sewered Sanitation Systems, P – Professional Qualifications Q – Indoor Horticultural Facilities, R – Tiny Homes and S - Onsite Stormwater Treatment**

DSA-SS proposes to not adopt new Appendices O, P, Q, R and S of the 2024 UPC into

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the 2025 edition of the CPC.

**CAC Recommendation:**

Approve

**Agency Response:**

Accept

**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).

No technical, theoretical, or empirical studies or reports were used, as Section 18928 and Section 18941 of the Health & Safety Code 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.

No new prescriptive standards are proposed.

**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.

DSA-SS has not identified any reasonable alternatives to the proposed action, and no adverse impact to small business due to these proposed changes is expected.

**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.

DSA-SS has not identified any reasonable alternatives to the proposed action, and no adverse impact to small business due to these proposed changes is expected.

**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.

DSA-SS has no facts, evidence, documents, testimony, or other evidence indicating any potential significant adverse impact on business with regard to the proposed action.

### **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)

Pursuant to Government Code Section 11346.2(b)(5)(B)(ii) adoption of the model codes is exempt from identification of the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates in the Initial Statement of Reasons

Division of the State Architect 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 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 or elimination of existing businesses 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 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 bring California into compliance with the most recent edition of the national model code (i.e. the 2024 UPC, developed by the International Association of Plumbing and Mechanical Officials), thereby benefiting the welfare of residents, worker safety, and the state's 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.

DSA estimates no new costs as Section 18928 of the Health and Safety Code mandates the adoption of the most recent addition of the model code.

Pursuant to Government Code Section 11346.2(b)(5)(B)(ii) adoption of the model codes is exempt from identification of the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates in the Initial Statement of Reasons.

## **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 conflict with federal regulations.