

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE CALIFORNIA DEPARTMENT OF WATER RESOURCES  
REGARDING THE 2025 CALIFORNIA PLUMBING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 5  
(DWR 01/24)**

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 Department of Water Resources' proposal to amend the 2022 California Plumbing Code was presented to the Plumbing, Electrical, Mechanical, and Energy (PEME) Code Advisory Committee during its March 25-26, 2024, meeting. Each committee recommendation is listed below, accompanied by DWR's response.

These are new amendments and existing amendments (some shown for context). The following item numbers used coordinate with the items listed in the Express Terms.

**ITEM 1**

**Chapter 1 – ADMINISTRATION DIVISION 1, CALIFORNIA ADMINISTRATION,  
Sections 1.13.0 through 1.13.2**

DWR proposes to carry 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) in the following CPC sections: 1.13.0, 1.13.1, 1.13.2.

- The purpose is to carry forward the 2022 CPC standards.
- This is necessary to retain the provisions of the 2022 CPC which specifies DWR's authority and scope of amendments.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 1, Sections 1.13.0 through 1.13.2.

**Agency Response:**

DWR accepts the CAC recommendation.

## ITEM 2

### Chapter 2 – DEFINITIONS, Sections 206.0 -D, 220.0 -R.

DWR proposes to carry forward existing California amendments in Chapter 2 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC sections: 206.0 -D, 220.0 -R.

- The purpose is to carry forward the 2022 CPC standards.
- This is necessary to retain the provisions of the 2022 CPC.
- There is no intended change in regulatory effect.

#### **CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 2, Sections 206.0 and 220.0.

#### **Agency Response:**

DWR accepts the CAC recommendation.

## ITEM 3

### Chapter 6 – WATER SUPPLY AND DISTRIBUTION, Sections 601.2 and 601.3.3

DWR proposes to carry forward existing California amendments in Chapter 6 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC sections: 601.2, 601.3.3.

- The purpose is to carry forward the 2022 CPC standards.
- This is necessary to retain the provisions of the 2022 CPC.
- There is no intended change in regulatory effect.

#### **CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 6, Sections 601.2 and 601.3.3.

#### **Agency Response:**

DWR accepts the CAC recommendation.

## ITEM 4

### Chapter 15 – ALTERNATE WATER SOURCES FOR NONPOTABLE APPLICATIONS, Sections 1501 through 1503

DWR proposes to carry forward existing California amendments in Chapter 15 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC sections: 1501.1, 1501.1.1, 1501.2, 1501.3, 1502.1, 1502.1 Exception, 1503.3, 1503.3 Exceptions.

- The purpose is to carry forward the 2022 CPC standards.
- This is necessary to retain the provisions of the 2022 CPC.
- There is no intended change in regulatory effect.

DWR proposes to carry forward DWR's adoptions of the UPC sections in Chapter 15 without amendment from the 2022 CPC for adoption into the 2025 edition of the CPC of the following UPC sections: 1501.4, 1501.5.1, 1501.8, 1501.10, 1502.0, 1502.5, 1502.5.1, 1502.5.2, 1502.6.

- The purpose is to carry forward the 2024 UPC language into the 2025 CPC.
- This is necessary to retain the provisions of the 2022 CPC.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Sections 1501 through 1503.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEMS 4-1 through 4-6  
Section 1501.5 through 1502.4**

DWR proposes to carry forward existing California amendments in Chapter 15 and to update applicable cross-referenced section numbers (as renumbered in the 2024 UPC) from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC sections: 1501.5 Exception, 1501.6, 1501.7 Exception, 1501.9, 1502.1 Exception, 1502.4 Exception.

- The purpose is to properly conform cross-referenced section numbers to sections that are renumbered in the 2024 UPC.
- This is necessary for correct cross-referencing for code users.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Sections 1501.5 through 1502.4.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 5**

**Chapter 15 – ALTERNATE WATER SOURCES FOR NONPOTABLE APPLICATIONS,  
Section 1505 Recycled Water Supply Systems in Buildings.**

**Sections 1505.0 through 1505.3**

DWR proposes to carry forward existing California amendments in Chapter 15 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC sections: (Sections: 1505.0, 1505.1.1, 1505.1.2, 1505.2, 1505.2.1, 1505.3).

- The purpose is to carry forward 2022 CPC standards.
- This is necessary to retain the provisions of the 2022 CPC.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Sections 1505.0 through 1505.3.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 5-1 & 5-2**  
**Sections 1505.1 and 1505.4**

DWR proposes to carry forward and amend existing California amendments in Chapter 15 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC sections: 1505.1 and 1505.4 Exceptions.

- The purpose is to clarify the source of regulatory information for recycled water application and uses: Title 22, Title 23, as well as the newly adopted State Water Resources Control Board's Cross-Connection Control Policy Handbook which replaces Title 17 provisions.
- This is necessary to alert code users to other state regulations that are important for the proper and safe installation and operation of recycled water systems.
- There is no intended change in regulatory effect.

In addition, DWR proposes to update applicable cross-referenced section numbers (as renumbered in the 2024 UPC) from the 2022 CPC for adoption into the 2025 edition of the CPC in the following sections: 1505.1 and 1505.4 Exceptions.

- The purpose is to properly conform cross-referenced section numbers to sections that are renumbered in the 2024 UPC.
- This is necessary for correct cross-referencing for code users.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Sections 1505.1 and 1505.4.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 5-3**  
**Section 1505.5 Water Pressure.**

DWR proposes to adopt the following 2024 UPC section in Chapter 15 without amendment into the 2025 edition of the CPC in the following CPC section: 1505.5.

DWR sought advice from Plumbing Manufacturers International (PMI), International Association of Plumbing and Mechanical Officials (IAPMO), and one water supplier. IAPMO added this section in the 2024 UPC to fill in an omission in the recycle water standards. This new requirement is consistent with current potable water pressure standards in the CPC, it will assist system designers by specifying the proper operating water pressure for recycled water fixtures, and it will allow for proper operation of recycled water fixtures. DWR concluded that the proposed section is a reasonable requirement.

- The purpose is to provide water pressure standards for recycled water fixtures consistent with potable water pressure as required in Section 608.0 in Chapter 6 of this code.
- This is necessary to ensure adequate pressure for the proper operation of recycled water fixtures and to provide clarity to the code user.
- The proposed amendment constitutes a new requirement for recycled water systems. However, DWR believes that this requirement is consistent with the water pressure used in current design practices for recycled water systems and

thus would have negligible regulatory effect.

**CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Section 1505.5.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 5-4**

**Section 1505.6 through 1505.16**

DWR proposes to carry forward existing California amendments in Chapter 15, to renumber the sections, and to update applicable cross-referenced section numbers from the 2022 CPC for adoption into the 2025 edition of the CPC, renumbered as in the 2024 UPC in the following sections: 1505.6, 1505.9.2, 1505.10 and Exception and Figure, 1505.11, 1505.13, 1505.14, 1505.14.2.2, 1505.14.2.3, 1505.14.2.4, 1505.16 and Table.

- The purpose is to carry forward the 2022 CPC standards, to renumber the sections, and to update the cross-referenced sections to accommodate the addition of a new 2024 UPC section.
- This is necessary to retain the provisions of the 2022 CPC, and to correctly number and cross-reference sections for code users.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Sections 1505.6 through 1505.16.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 5-5**

**Section 1505.14.2 (formerly 1505.13.2) Cross-Connection Inspection and Testing.**

DWR proposes to carry forward and amend existing California amendments in Chapter 15 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC section: 1505.14.2. Under regulations in California Code of Regulations, Title 22, Section 60316, inspection and testing for cross-connection control is required to be performed by a cross-connection control specialist that is certified. Now, with the State Water Resources Control Board's newly adopted Cross-Connection Control Policy Handbook code users are directed to this handbook for more specific requirements for cross-connection control certification.

- The purpose is to carry forward the 2022 CPC standards and to clarify the source of regulatory information for certification of cross-connection control specialists.
- This is necessary to retain the provisions of the 2022 CPC and to refer code users to the handbook for the specific certification requirements.
- There is no intended change in regulatory effect.

In addition, DWR proposes to renumber the section, to update applicable cross-referenced

section numbers from the 2022 CPC for adoption into the 2025 edition of the CPC as renumbered in the 2024 UPC in the following section: 1505.14.2.

- The purpose is to renumber the section, and to update the cross-referenced sections to accommodate the addition of a new 2024 UPC section.
- This is necessary to correctly number and cross-reference sections for code users.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Section 1505.14.2.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 5-6**

**Section 1505.7 through 1505.15**

DWR proposes to carry forward existing California amendments in Chapter 15 from the 2022 CPC for adoption into the 2025 edition of the CPC as renumbered as in the 2024 UPC in the following sections: 1505.7, 1505.8, 1505.9.1, 1505.12, 1505.13.1, 1505.13.2, 1505.13.3, 1505.14.1, 1505.14.2.1, 1505.15.

- The purpose is to carry forward the 2022 CPC standards and to conform to renumbering of the CPC due to the proposed addition of a new section.
- This is necessary to retain the provisions of the 2022 CPC and to correctly number sections for code users.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Sections 1505.7 through 1505.15.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 5-7**

**Section 1505.9 (formerly 1505.8) Valves.**

DWR proposes to carry forward DWR's adoption of the following 2024 UPC section in Chapter 15 without amendment as renumbered in the 2024 UPC for adoption into the 2025 edition of the CPC in the following CPC section: 1505.9.

- The purpose is to carry forward the 2024 UPC language into the 2025 CPC and to conform to renumbering of the CPC due to the proposed addition of a new section.
- This is necessary to retain the provisions of the 2022 CPC and to correctly number sections for code users.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Section 1505.9.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 6**

**Chapter 15 – ALTERNATE WATER SOURCES FOR NONPOTABLE APPLICATIONS, Section 1506.4 Connections to Potable or Reclaimed (Recycled) Water Systems.**

DWR proposes to carry forward existing California amendments in Chapter 15 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC section: 1506.4.

- The purpose is to carry forward the 2022 CPC standards.
- This is necessary to retain the provisions of the 2022 CPC.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 15, Section 1506.4.

**Agency Response:**

DWR accepts the CAC recommendation.

**ITEM 7**

**Chapter 16 – NONPOTABLE RAINWATER CATCHMENT SYSTEMS APPLICATIONS, Section 1602.4 Connections to Potable or Reclaimed (Recycled) Water Systems.**

DWR proposes to carry forward existing California amendments in Chapter 16 from the 2022 CPC for adoption into the 2025 edition of the CPC in the following CPC section: 1602.4.

- The purpose is to carry forward the 2022 CPC standards.
- This is necessary to retain the provisions of the 2022 CPC.
- There is no intended change in regulatory effect.

**CAC Recommendation:**

The PEME Ad Hoc Code Advisory Committee recommended Approve as Submitted the existing amendments to Chapter 16, Section 1602.4.

**Agency Response:**

DWR accepts the CAC recommendation.

**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).

DWR did not rely on any technical, theoretical, or empirical study, report, or similar document for this proposal, which contains a new UPC section and non-substantive amendments that clarify existing law and regulations, with no intended change in regulatory effect. This new UPC section relies on existing water pressure requirements found in Chapter 6 of the UPC for potable water systems.

## **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.

Prescriptive standards provide explicit guidance for certain mandated requirements; consistent application and enforcement of building standards while also establishing clear design parameters and ensuring compliance with minimum health, safety, and welfare standards for owners, occupants, and guests.

California Building Standards Law (Health and Safety Code Section 18901 et seq) requires the adoption of the Uniform Plumbing Code into the California Plumbing Code (CPC), which contains prescriptive building standards. The CPC provides prescriptive standards for the installation of recycled water supply systems. Some of the prescriptive standards in the CPC are from the drinking water supply requirements in the State Water Resources Control Board's newly adopted Cross-Connection Control Policy Handbook (replacing Title 17) and from the recycled water use criteria in Title 22 of the California Code of Regulations.

However, this proposal does not mandate the use of specific technologies or equipment beyond the existing requirements already contained within the CPC. This proposal consists primarily of changes without intended regulatory effect and the addition of one new UPC section regarding appropriate water pressure standards for recycled water fixtures that is not expected to have any significant regulatory effect or cost impact. The proposed section is a reasonable requirement for recycled water as is consistent with adopted potable water 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.

DWR has not identified any reasonable alternatives to these proposed regulations, which do not mandate the use of specific technologies or equipment. This proposal consists primarily of changes without intended regulatory effect and the addition of one new UPC section that is not expected to have any significant regulatory effect or cost impact.

## **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.

DWR has not identified any reasonable alternatives to these proposed regulations, which would not have an adverse impact on small business. This proposal consists primarily of changes without intended regulatory effect and the addition of one new UPC section that is not expected to have any significant regulatory effect or cost impact.

### **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.

DWR communicated with the State Water Resources Control Board regarding the proposal to amend various Chapter 15 sections referencing the Cross-Connection Control Policy Handbook to clarify proposed language. DWR also communicated with BSC, IAPMO and PMI. Based on feedback, DWR is proposing to carry forward language from the 2022 CPC and to propose one new UPC section into this proposal for adoption into the 2025 edition of the CPC with negligible to no change in regulatory effect.

DWR has determined that this regulatory action would have no 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)

DWR 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 proposal consists primarily of changes without intended regulatory effect and the addition of one new UPC section that is not expected to have any significant regulatory effect or cost impact. Therefore, it 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 proposal consists primarily of changes without intended regulatory effect, and the addition of one new UPC section that is not expected to have any significant regulatory effect or cost impact. Therefore, it will not affect the creation of new businesses or the elimination of existing businesses within the State of California.

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

This proposal consists primarily of changes without intended regulatory effect, and the addition of one new UPC section that is not expected to have any significant regulatory effect or cost impact. Therefore, the proposed amendments will not affect the expansion of businesses currently doing business within the State of California. The CPC as currently in effect and as changed by the proposed amendments facilitates the use of recycled water, and

thereby could allow businesses to expand in areas that are constrained by water availability.

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

The proposed amendments will update and improve California Plumbing Code standards for the safe use of recycled water when buildings are plumbed with both potable and recycled water. The clarifying code language will produce sensible and usable state building standards that promote health and safety.

**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.

This proposal consists primarily of changes without intended regulatory effect, and the addition of one new UPC section that is not expected to have any significant regulatory effect or cost impact. As such, DWR estimates there will be no additional cost for the regulated community to comply with these building standards. DWR concludes there will be insignificant, if any, additional cost of compliance.

The benefits of this code change include clarifying code language that will produce sensible and usable state building standards that promote health and safety, as well as potable water savings consistent with DWR's mission.

**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.

There are no comparable federal regulations.