

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY  
DEVELOPMENT  
REGARDING THE 2025 CALIFORNIA MECHANICAL CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 4  
(HCD 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.

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 Mechanical Code (CMC) within the California Code of Regulations (CCR), title 24, part 4, are necessary to meet HCD's mandate in HSC, section 17922(a).

The 2025 CMC is based on the 2024 Uniform Mechanical Code (UMC), which will be effective on January 1, 2026. Specific rationale for this proposed rulemaking is provided within the respective items herein.

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**ITEM 1**

**Chapter 1 Administration, Division I, California Administration**

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

**1.1.1 Title.**

**Rationale:** The proposed modification updates the reference from the 2021 Uniform Mechanical Code (UMC) to the 2024 UMC to comply with HCD's mandate in HSC, section 17922(a).

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

## **ITEM 2**

### **Chapter 1 Administration, Division II, Administration**

HCD proposes to adopt Chapter 1, Division II, section 104.2 only from the 2024 UMC into the 2025 California Mechanical Code (CMC) without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 3**

### **Chapter 2 Definitions**

HCD proposes to adopt Chapter 2 from the 2024 UMC and bring forward existing California amendments from the 2022 CMC into the 2025 CMC without modification.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 4**

### **Chapter 3 General Regulations**

HCD proposes to adopt Chapter 3 from the 2024 UMC and bring forward existing California amendments from the 2022 CMC into the 2025 CMC without modification.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 5**

### **Chapter 4 Ventilation Air**

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

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

## ITEM 6

### Chapter 5 Exhaust Systems

HCD proposes to adopt Chapter 5 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 7

### Chapter 6 Duct Systems

HCD proposes to adopt Chapter 6 of the 2024 CMC (except section 603.9.2) and bring forward existing California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 8

### Chapter 7 Combustion Air

HCD proposes to adopt Chapter 7 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 9

### Chapter 8 Chimneys and Vents

HCD proposes to adopt Chapter 8 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

## **ITEM 10**

### **Chapter 9 Installation of Specific Appliances**

HCD proposes to adopt Chapter 9 from the 2024 UMC (except Sections 929.0 and 929.1) and bring forward existing California amendments from the 2022 CMC into the 2025 CMC without modification.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 11**

### **Chapter 10 Boilers and Pressure Vessels**

HCD proposes to adopt Chapter 10 from the 2024 UMC and bring forward existing California amendment from the 2022 CMC into the 2025 CMC without modification.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 12**

### **Chapter 11 Refrigeration**

HCD proposes to adopt Chapter 11 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 13**

### **Chapter 12 Hydronics**

HCD proposes to adopt Chapter 12 from the 2024 UMC and bring forward existing California amendment from the 2022 CMC into the 2025 CMC without modification.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

## ITEM 14

### Chapter 13 Fuel Gas Piping

HCD proposes to adopt Chapter 13 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 15

### Chapter 14 Process Piping

HCD proposes to not adopt Chapter 14 from the 2024 UMC.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 16

### Chapter 15 Solar Energy Systems

HCD proposes to adopt Chapter 15 from the 2024 UMC and bring forward existing California amendments from the 2022 CMC into the 2025 CMC without modification.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 17

### Chapter 16 Stationary Power Plants

HCD proposes to adopt Chapter 16 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

## **ITEM 18**

### **Chapter 17 Geothermal Energy Systems and Ambient Temperature Loops**

HCD proposes to adopt Chapter 17 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 19**

### **Chapter 18 Referenced Standards**

HCD proposes to adopt Chapter 18 from the 2024 UMC into the 2025 CMC without amendment.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 20**

### **Appendix A Residential Plans Examiner Review Form for HVAC System Design**

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

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 21**

### **Appendix B Procedures to be Followed to Place Gas Equipment In Operation**

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

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## **ITEM 22**

### **Appendix C Installation and Testing of Oil (Liquid) Fuel-Fired Equipment**

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

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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**ITEM 23**

**Appendix D Fuel Supply: Manufactured/Mobilehome Parks and Recreational Vehicle Parks**

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

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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**ITEM 24**

**Appendix E Sustainable Practices**

HCD proposes to not adopt Appendix E from the 2024 UMC.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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**ITEM 25**

**Appendix F Sizing of Venting Systems and Outdoor Combustion and Ventilation Opening Design**

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

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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**ITEM 26**

**Appendix G Example Calculation of Outdoor Air Rate**

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

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

## ITEM 27

### Appendix H Professional Qualifications

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

**Rationale:** Appendix H is specific to professional qualification, licensing, and certifications for installers and inspectors for systems and facilities covered in the appendix, which is outside HCD's scope of authority.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 28

### Appendix I Indoor Horticultural Facilities

HCD proposes to not adopt Appendix I from the 2024 UMC.

**Rationale:** Appendix I is specific to indoor horticulture facilities outside of HCD's scope and authority.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## ITEM 29

### Appendix J Clean Air Delivery

HCD proposes not to adopt Appendix J from the 2024 UMC.

**Rationale:** Appendix J is specific to occupancy groups outside of HCD's scope and authority.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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## 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 UMC published by the International Association of Plumbing & Mechanical Officials.



## **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., UMC, 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 the most recent edition of this model code by reference. The proposed amendments are the only reasonable alternative for clarifying the 2025 CMC to accommodate California conditions.

## **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(a).

## **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 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 11346.3(b)(1) and 11346.5(a)(10)

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 or the 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 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 UMC by reference with California amendments will provide stakeholders with safe and efficient mechanical installations while allowing for innovation, new technologies, and accommodation of specialized requirements for the State of California. 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)(a) 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 UMC which is a model code setting forth requirements for installation and maintenance of heating, ventilating, cooling, and refrigeration systems in structures. The potential benefits provide recognition and appropriate use of new technology and materials, clarity for the code users and local enforcement agencies, and may increase business due to the adoption of new building standards. As noted previously, 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.