

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY  
DEVELOPMENT  
REGARDING THE 2025 CALIFORNIA PLUMBING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 5  
(HCD 03/24)**

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 Plumbing Code (CPC) within the California Code of Regulations (CCR), title 24, part 5, are necessary to meet HCD's mandate in HSC, section 17922(a).

The 2025 CPC proposal is based on the 2024 Uniform Plumbing Code (UPC), 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 I, from the 2022 CPC for adoption into the 2025 CPC with modification as follows:

**1.1.1 Title.**

**Rationale:** The proposed amendments to the applicable model code update the reference from the 2021 Uniform Plumbing Code (UPC) to the 2024 UPC to comply with HCD's mandate in HSC, section 17922(a).

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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## ITEM 2

### Chapter 1, Division II, Administration

HCD proposes to adopt Chapter 1, Division II, section 104.2 only, from the 2024 UPC into the 2025 CPC without amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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## ITEM 3

### Chapter 2, Definitions

HCD proposes to adopt Chapter 2 from the 2024 UPC (except definitions of Diverter Valve, Gray Water”, “Diverter Valve, On-Site Treated Nonpotable Water”, and “Diverter Valve, Rainwater”) and bring forward California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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## ITEM 4

### Chapter 3, General Regulations

HCD proposes to adopt Chapter 3 of the 2024 UPC (except Sections 301.3.1, 301.3.1.1, and 301.3.1.2) and bring forward California amendments from the 2022 CPC into the 2025 CPC with the following modification:

#### **301.7 [formerly section 301.6] One- and Two-Family Dwellings.**

**Rationale:** HCD proposes to renumber this existing California amendment due to 2024 UPC renumbering. This existing California amendment was in section 301.6 of the 2022 CPC and is proposed to be renumbered to section 301.8 in the 2025 CPC. There is no intended change in regulatory effect.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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## ITEM 5

### Chapter 4, Plumbing Fixtures and Fixture Fittings

HCD proposes to adopt Chapter 4 from the 2024 UPC (except Sections 422.2, 422.4, and 422.5) and bring forward California amendments from the 2022 CPC into the 2025 CPC with the following modifications:

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## **SECTION 408.0.0 – SHOWERS**

### **408.3 [formerly section 408.2] Water Consumption.**

**Rationale:** HCD proposes to relocate this existing California amendment due to 2024 UPC renumbering. This existing California amendment was in section 408.2 of the 2022 CPC and was renumbered to section 408.3 in the 2024 UPC. HCD is also proposing to amend the UPC flow rate for “body sprays” from 2.5 gallons per minute (gpm) to 1.8 gallons per minute (gpm) to align with existing California amendments for flow rates for showerheads and add the metric equivalent information for consistency with existing amendments. HCD is also proposing an amendment to this section to clarify that body sprays shall meet the CALGreen requirements for showerheads located in Division 4.3 of the California Green Building Standards Code (CALGreen). This amendment aligns with CCR, title 20, Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC). There is no intended change in regulatory effect, as these requirements already exist in CALGreen and CEC Appliance Efficiency Regulations.

## **SECTION 420.0 – SINKS**

### **420.2.2. Kitchen Faucets. [HCD 1]**

**Rationale:** HCD proposes to adopt the above referenced existing California amendment with modification. The modification adds a metric equivalent for 60 psi to maintain consistency with other building standards.

### **420.3.1 Pre-Rinse Spray Valves. [HCD 1 & HCD 2]**

**Rationale:** HCD 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 rate 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). New in the 2024 Uniform Plumbing Code, adopted the federal language within the code that allows BSC to repeal referenced Table H-2 and adopt model code.

## **SECTION 422.0 – MINIMUM NUMBER OF REQUIRED FIXTURES**

### **TABLE 422.1 Minimum Plumbing Facilities.**

**Rationale:** HCD proposes to adopt the above referenced Table with existing California amendments with a modification. The modification renumbers the existing California amendment Note 6 to Note 8 due to the addition of 2024 UPC Notes 6 and 7. Additionally, HCD proposes to modify the existing model code language below the title by including reference to footnote “8”, which was removed during printing of the CPC and serves as a pointer to a California amendment. There is no intended change in regulatory effect.

#### **CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 6**

**Chapter 5, Water Heaters**

HCD proposes to adopt Chapter 5 from the 2024 UPC and bring forward California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 7**

**Chapter 6, Water Supply and Distribution**

HCD proposes to adopt Chapter 6 (except Section 609.11) from the 2024 UPC and bring forward California amendments from the 2022 CPC into the 2025 CPC with the following modification:

**605.9.1 Fittings.**

**Rationale:** HCD proposes to adopt the above referenced section with a modification to an existing California amendment. The revision will modify the California amendment referencing building standard “NSF 14” to “NSF/ANSI 14”. This amendment is being carried forward from the 2022 intervening code adoption cycle. This will avoid regularly monitoring and coordinating updates to future code cycles. There is no intended change in regulatory effect.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 8**

**Chapter 7, Sanitary Drainage**

HCD proposes to adopt Chapter 7 from the 2024 UPC and bring forward California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 9****Chapter 8, Indirect Wastes**

HCD proposes to adopt Chapter 8 from the 2024 UPC into the 2025 CPC without amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 10****Chapter 9, Vents**

HCD proposes to adopt Chapter 9 from the 2024 UPC and bring forward California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 11****Chapter 10, Traps and Interceptors**

HCD proposes to adopt Chapter 10 from the 2024 UPC and bring forward California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 12****Chapter 11, Storm Drainage**

HCD proposes to adopt Chapter 11 from the 2024 UPC and bring forward California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 13****Chapter 12, Fuel Gas Piping**

HCD proposes to adopt Chapter 12 from the 2024 UPC into the 2025 CPC without

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amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 14**

**Chapter 13, Health Care Facilities and Medical Gas and Medical Vacuum Systems**

HCD proposes to not adopt Chapter 13 from the 2024 UPC.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 15**

**Chapter 14, Firestop Protection**

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 16**

**Chapter 15, Alternate Water Sources for Nonpotable Applications**

HCD proposes to adopt Chapter 15 of the 2024 UPC (except sections 1501.5.2; 1502.3.4; 1503.9.3-1503.9.7; 1505; and Table 1501.5.) and bring forward California amendments from the 2022 CPC into the 2025 CPC with the following modifications:

**SECTION 1501.0 - GENERAL**

**1501.7 Minimum Water Quality Requirements [HCD 1].**

**Rationale:** HCD proposes to bring forward the existing California amendment with modification due to 2024 UPC renumbering and relocation of design and installation requirements for onsite treated nonpotable systems. The modification renumbers referenced section 1506.9.2 to section 1506.10.2 in the 2025 CPC to align with new model code numbering. There is no intended change in regulatory effect.

**SECTION 1503.0 – GRAY WATER SYSTEMS**

**1503.6 Prohibited Location.**

**Rationale:** HCD is proposing to fix a publication error, restoring a repeal of model code language that was reinserted into the 2022 CPC. The amendment eliminates items that are already covered in duplication with Section 1503.0 The term “geologically sensitive

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area as determined by the Authority Having Jurisdiction”, is proposed to be deleted because “geologically sensitive area” is not a defined term that can be universally applied statewide. Site conditions vary statewide, and it is more appropriate for the local enforcing agencies to determine where gray water systems shall not be installed.

### **1503.7 Drawings and Specifications.**

**Rationale:** HCD is fixing a publication error, restoring a repeal of model code language that was reinserted into the 2022 CPC. The 2022 CPC reinserted previously repealed language, “in accordance with the Authority Having Jurisdiction”, that was repealed by HCD during the 2012 Triennial Code Adoption Cycle. This language was repealed due to the fact that each enforcing agency has their own requirements for permit issuance “shall require” has been changed to “may require” with regard to the information required on the plans.

## **SECTION 1506.0 – ON-SITE NONPOTABLE GRAY WATER SYSTEMS**

### **1506.5 Water Pressure.**

**Rationale:** HCD proposes to adopt the above referenced section with a California amendment. This California amendment adds the term “gray” to the model code reference “On-site treated non-potable (*gray*) water systems”, which maintains consistency with existing California amendments in CPC chapters 2, 15, and 16. There is no intended change in regulatory effect.

### **1506.10 [formerly section 1506.9] Design and Installation.**

**Rationale:** HCD proposes to bring forward the existing California amendment with modification due to 2024 UPC renumbering. This existing California amendment was in section 1506.9 of the 2022 CPC and is proposed to be renumbered to section 1506.10 in the 2025 CPC. HCD proposes to update reference section 1506.10.5 to section 1506.10.6 to accommodate 2024 UPC renumbering. There is no intended change in regulatory effect.

#### **1506.10.2 [formerly 1506.9.2] Minimum Water Quality**

**Rationale:** HCD proposes to continue to adopt the above referenced section with existing California amendment with a new amendment and a modification. HCD proposes to repeal CA amendment referencing building standard NSF 350 and adopt the updated building standard in the 2024 UPC, NSF/ANSI 350. HCD also proposes to co-adopt a BSC amendment that adds a new referenced standard, IAPMO IGC 324, to this section which is an additional referenced treatment for alternate water sources. The renumbering is due to the model code adding a new section, 1506.5 “Water Pressure”. There is no intended change in regulatory effect.

#### **1506.10.6 [formerly section 1506.9] Disinfection.**

**Rationale:** HCD proposes to bring forward the existing California amendment with modification due to 2024 UPC renumbering. This existing California amendment was in section 1506.9.6 of the 2022 CPC and is proposed to be renumbered to section 1506.10.6 in the 2025 CPC. There is no intended change in regulatory effect.

### **CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 17**

**Chapter 16, Nonpotable Rainwater Catchment Systems**

HCD proposes to adopt Chapter 16 of the 2024 UPC (except Sections 1601.5.2, 1605.3.4, and Table 1601.5) and bring forward California amendments from the 2022 CPC into the 2025 CPC with the following modifications:

**SECTION 1601.0 - GENERAL**

**1601.7 Minimum Water Quality Requirements.**

**Rationale:** HCD proposes to bring forward the existing California amendment with modification due to 2024 UPC renumbering. This existing California amendment was identified as Table 1603.5 in the 2022 CPC and is proposed to be renumbered to Table 1603.4 in the 2025 CPC. There is no intended change in regulatory effect.

**SECTION 1603.0 – DESIGN AND INSTALLATION**

**1603.20 Rainwater Diversion Valves.**

**Rationale:** In response to comments received from industry, HCD and BSC are proposing to harmonize amendments in the above referenced section from the 2024 UPC with new California amendments. HCD has coordinated with BSC to propose the removal of references to IAPMO PS 59 and IAPMO ICG 352 standards for diverter valves, to allow for more markedly available valves. The type of valve used should be left up to the builder or designer. To clarify the type of diverter valve and the minimum level of access to the diverter valve, HCD proposes to amend this section by adding “*be an approved diverter valve*” and adding “*readily*” for the valve to be placed in a readily accessible location. This amendment is consistent with the amendment being carried forward in section 1503.2.2 Diversion from the 2022 CPC into the 2025 CPC. These amendments are in response to stakeholders having expressed concern that other diverter valves may perform the same function without being specifically “gray water/rainwater” diverter valve complying with IAPMO PS 59 and IAPMO ICG 352 standards. In addition, this will allow the enforcing agencies the ability to approve listed valves for local use in Nonpotable Rainwater Catchment Systems.

**1603.4.1 [formerly section 1603.5.2] Disinfection.**

**Rationale:** HCD proposes to bring forward existing California amendment with modifications due to 2024 UPC renumbering. This existing California amendment was identified as section 1603.5.2 in the 2022 CPC and is proposed to be renumbered to section 1603.4.1 in the 2025 CPC. There is no intended change in regulatory effect.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD



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**ITEM 18****Chapter 17, Referenced Standards**

HCD proposes to adopt Chapter 17 from the 2024 UPC and bring forward California amendments from the 2022 CPC into the 2025 CPC with the following modifications:

**Table 1701.1**

**Rationale:** HCD proposes to bring forward existing California amendment with modifications. The existing California amendment referenced sections 1506.9.6 and 1603.5.2 in the 2022 CPC and are proposed to be renumbered to sections 1506.10.6 and 1603.4.1, respectively, in the 2025 CPC. Additionally, HCD proposes to update the referenced sections in standards number NSF/ANSI 14-2020, by incorporating CPC section 605.9.1 “Fittings”, where an existing California amendment references the updated building standard. There is no intended change in regulatory effect.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 19****Appendix A, Recommended Rules for Sizing the Water Supply System**

HCD proposes to adopt Appendix A from the 2024 UPC and bring forward existing California amendments from the 2022 CPC into the 2025 CPC without amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 20****Appendix B, Explanatory Notes on Combination Waste and Vent Systems**

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 21****Appendix C, Alternate Plumbing Systems**

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 22**

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

HCD proposes to adopt Appendix D from the 2024 UPC into the 2025 CPC without amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 23**

**Appendix E, Manufactured/Mobile Home Parks and Recreational Vehicle Parks**

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 24**

**Appendix F, Firefighter Breathing Air Replenishment Systems**

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 25**

**Appendix G, Sizing of Venting Systems**

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 26**

**Appendix H, Private Sewage Disposal Systems**

HCD proposes to adopt Appendix H from the 2024 UPC into the 2025 CPC without

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amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 27**

**Appendix I, Installation Standards**

HCD proposes to adopt only IAPMO IS 31-2022, Installation Standard for PEX Tubing Systems for Hot- and Cold-water Distribution of Appendix I from the 2024 UPC into the 2025 CPC without amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 28**

**Appendix J, Combination of Indoor and Outdoor Combustion and Ventilation Opening Design**

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 29**

**Appendix K, Potable Rainwater Catchment Systems**

HCD proposes to not adopt Appendix K from the 2024 UPC.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 30**

**Appendix L, Sustainable Practices**

HCD proposes to not adopt Appendix L from the 2024 UPC.

**CAC Recommendation:**

TBD

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**Agency Response:**

TBD

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**ITEM 31**

**Appendix M, Peak Water Demand Calculator**

HCD proposes to adopt Appendix M from the 2024 UPC and bring forward existing California amendments from the 2022 CPC into the 2025 CPC without modification.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 32**

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

HCD proposes to not adopt Appendix N from the 2024 UPC.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 33**

**Appendix O, Non-Sewered Sanitation Systems**

HCD proposes to not adopt Appendix O into the 2025 CPC.

**Rationale:** Appendix O is specific to non-sewered sanitation systems, which is outside HCD's scope of authority.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 34**

**Appendix P, Professional Qualifications**

HCD proposes to not adopt Appendix P from the 2024 UPC.

**Rationale:** Appendix P 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:**

TBD

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**Agency Response:**

TBD

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**ITEM 35**

**Appendix Q, Indoor Horticultural Facilities**

HCD proposes to not adopt Appendix Q from the 2024 UPC.

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

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 36**

**Appendix R, Tiny Houses**

HCD proposes to not adopt Appendix R from the 2024 UPC.

**Rationale:** Appendix R provides specific plumbing provisions that apply to newly constructed "tiny houses" which, as defined in Appendix R, include recreational vehicles (RV) and manufactured homes (MH). The design and construction standards for newly constructed RVs and MHs are outside HCD's scope of authority and, pursuant to state law, are not subject to building standards.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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**ITEM 37**

**Appendix S, Onsite Stormwater Treatment Systems**

HCD proposes to adopt Appendix S from the 2024 UPC into the 2025 CPC without amendment.

**CAC Recommendation:**

TBD

**Agency Response:**

TBD

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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

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agency relies in proposing the regulation(s).

2024 UPC, published by IAPMO.

### **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., UPC, 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 this model code by reference. The proposed amendments are the only reasonable alternative for clarifying the 2025 CPC 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)

HCD has assessed whether or not 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 UPC by reference with California amendments will provide stakeholders with safe and efficient plumbing 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)(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.

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 as otherwise specified. The purpose of this rulemaking is to adopt the 2024 UPC, which is a model code, setting forth requirements for installation and maintenance of plumbing 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.