

**INITIAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE STATE FIRE MARSHAL  
REGARDING THE 2025 CALIFORNIA PLUMBING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 5  
(SFM 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 specific purpose of this rulemaking effort by the Office of the State Fire Marshal is to act accordance with Health and Safety Code section 18928, which requires all proposed regulations to specifically comply with this section in regard to the adoption by reference with amendments to a model code within one year after its publication.

The rationale for these actions is to establish minimum requirements for the prevention of fire and for the protection of life and property against fire and panic in occupancies addressed in the 2024 Uniform Plumbing Code and be published as the 2025 California Plumbing Code.

The general purpose of this proposed action is principally intended to update and codify a new edition of the California Plumbing Code (California Code of Regulations, Title 24, Part 5) based upon a more current edition of a model code. The current California Plumbing Code in effect is the 2022 California Plumbing Code which is based upon the 2021 Uniform Plumbing Code of the International Association of Plumbing and Mechanical Officials.

**ITEM 1**

**Chapter 1, Administration**

The SFM proposes to carry forward existing California amendments contained in Sections 1.11 through 1.11.11 with modifications as shown in Item 1-1.

**ITEM 1-1**

**Division I, California Administration, Section 1.1.1 Title**

The proposal is to replace the 2021 Uniform Plumbing Code with the current model code edition 2024 Uniform Plumbing Code of the International Association of Plumbing and Mechanical Officials (IAPMO).

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 2**

**Chapter 2, Definitions**

The SFM proposes to adopt Chapter 2.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 3**

**Chapter 3, General Regulations**

The SFM proposes to adopt Chapter 3 and carry forward existing amendments.

**ITEM 3-1**

**Section 310.0 Prohibited Fitting and Practices.**

The SFM proposes to carry forward existing amendment formally 310.11 and renumber as Section 310.13. There is no regulatory change.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 4**

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

The SFM proposes to not adopt Chapter 4.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 5**

**Chapter 5, Water Heaters**

The SFM proposes to adopt Chapter 5 and carry forward existing amendments.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 6**

**Chapter 6, Water Supply And Distribution**

The SFM proposes to adopt only 612.0 and 612.1 and carry forward existing amendments.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 7**

**Chapter 7, Sanitary Drainage**

The SFM proposes to not adopt Chapter 7.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 8**

**Chapter 8, Indirect Wastes**

The SFM proposes to not adopt Chapter 8.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 9**

**Chapter 9, Vents**

The SFM proposes to not adopt Chapter 9.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 10

### Chapter 10, Traps and Interceptors

The SFM proposes to not adopt Chapter 10.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 11

### Chapter 11, Storm Drains

The SFM proposes to not adopt Chapter 11.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

## ITEM 12

### Chapter 12, Fuel Gas Piping

The SFM proposes to adopt Chapter 12 and carry over existing amendments with additional amendments shown in Items 12-1 and 12-2.

#### ITEM 12-1

##### Section 1210.12.5.2 Electrical Requirements

The SFM proposes to amend the reference from NFPA 70 to the California Electrical Code.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

#### ITEM 12-2

##### Section 1211.2.4 Bonding Connections

The SFM proposes to amend the reference from NFPA 70 to the California Electrical Code.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

### **ITEM 13**

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

The SFM proposes to adopt Chapter 13.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

### **ITEM 14**

#### **Chapter 14, Firestop Protection**

The SFM proposes to adopt Chapter 14.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

### **ITEM 15**

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

The SFM proposes to not adopt Chapter 15.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

### **ITEM 16**

#### **Chapter 16, Nonpotable Rainwater Catchment Systems**

The SFM proposes to not adopt Chapter 16.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

### **ITEM 17**

#### **Chapter 17, Reference Standards**

The SFM proposes to adopt Chapter 17 and carry forward existing amendments. Additional proposed amendments are shown in the items below.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-1**

**Chapter 17, NFPA 30A Motor Fuel Dispensing Facilities and Repair Garages**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-2**

**Chapter 17, NFPA 37 Standard for Installation and Use of Stationary Combustion Engines and Gas Turbines**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-3**

**Chapter 17, NFPA 51 Design and Installation of Oxygen-Fuel Gas Systems for Welding, Cutting, and Allied Processes**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-4**

**Chapter 17, NFPA 54/ANSI Z223.1 National Fuel Gas Code**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-5**

**Chapter 17, NFPA 58 Liquefied Petroleum Gas Code**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-6**

**Chapter 17, NFPA 70 National Electrical Code**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-7**

**Chapter 17, NFPA 88A Standard for Parking Structures**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-8**

**Chapter 17, NFPA 99 Health Care Facilities Code**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-9**

**Chapter 17, NFPA 211 Standard for Chimneys, Fireplaces, Vents, and Solid Fuel-Burning Appliances.**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 17-10**

**Chapter 17 NFPA 780 Standard for the Installation of Lightning Protection Systems**

This proposal is to update the standard to the latest edition. This change additionally corresponds with the other parts of Title 24.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 18**

**Appendices A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S**

The SFM proposes to adopt Appendix R only and do not adopt Appendices A through Q and S.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]

**ITEM 19**

**Useful Tables**

The SFM proposes to adopt Useful Tables.

**CAC Recommendation:**

[Enter CAC recommendation(s), if any]

**Agency Response:**

[Enter the agency's response to CAC recommendation(s)]



## **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).

The SFM did not rely on any technical, theoretical, and empirical study, report, or similar documents outside of those contained in this rulemaking in proposing that CBSC adopt said model code as a reference standard for the placement of existing SFM regulatory amendments for the California Building Standards Codes.

## **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.

The SFM believes that the amendments to the model code and additional building standards proposed are offered in both a prescriptive and performance base. The nature and format of the model code adopted by reference allow for both methods, the following is a general overview of the model code proposed to be adopted by reference as well as state modifications:

This comprehensive plumbing code establishes minimum regulations for fire prevention and fire protection systems using prescriptive and performance-related provisions. It is founded on broad-based principles that make possible the use of new materials and new system designs.

This code is founded on principles intended to establish provisions consistent with the scope of a building and fire code that adequately protects public health, safety and welfare; provisions that do not unnecessarily increase construction costs; provisions that do not restrict the use of new materials, products or methods of construction; and provisions that do not give preferential treatment to types or classes of materials, products or methods of construction.

The Uniform Plumbing Code (UPC) provisions provide many benefits, among which is the model code development process that offers an international forum for building and fire safety professionals to discuss performance and prescriptive code requirements. This forum provides an excellent arena to debate proposed revisions. This model code also encourages international consistency in the application of provisions.

## **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.

The SFM has determined that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective and less burdensome to affected private persons than the proposed adoption by reference with

SFM amendments. Therefore, there are no alternatives available to the SFM regarding the proposed adoption of this code.

### **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.

The SFM has determined that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective and less burdensome to affected small businesses than the proposed adoption by reference with SFM amendments. Therefore, there are no alternatives available to the SFM regarding the proposed adoption of this code.

### **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.

The SFM has determined that this proposed action will not have a significant adverse economic impact on business. Health and Safety Code Section 18928 requires the SFM, when proposing the adoption of a model code, national standard, or specification shall reference the most recent edition of the applicable model code, national standard, or specification. Therefore, there are no other facts, evidence, documents, testimony, or other evidence on which the SFM relies to support this rulemaking.

### **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)

State Fire Marshal 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 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 cause elimination, new or 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 business 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.**

These regulations will 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.

The SFM does not anticipate any significant cost of compliance with the proposed building standards. The regulations are based on the model code. Health & Safety section 18928 requires that building standard be essentially the same as the most recent edition of the uniform industry codes. These regulations benefits are to have clear, concise, complete and update text of the regulations and standards.

### **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 SFM has determined that this proposed rulemaking action does not unnecessary duplicate or conflict with federal regulations contained in the Code of Federal Regulations that address the same issues as this proposed rulemaking.