

**FINAL STATEMENT OF REASONS
FOR PROPOSED BUILDING STANDARDS
OF THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY
DEVELOPMENT
REGARDING THE 2025 CALIFORNIA BUILDING CODE, 2025 CALIFORNIA
ELECTRICAL CODE, 2025 CALIFORNIA MECHANICAL CODE, AND 2025
CALIFORNIA PLUMBING CODE
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PARTS 2, 3, 4, & 5
(HCD 1-AC 01/25)**

The Administrative Procedure Act requires that every agency shall maintain a file of each rulemaking that shall be deemed to be the record for that rulemaking proceeding. The rulemaking file shall include a Final Statement of Reasons. The Final Statement of Reasons shall be available to the public upon request when rulemaking action is being undertaken. The following are the reasons for proposing this particular rulemaking action:

UPDATES TO THE INITIAL STATEMENT OF REASONS:

Government Code Section 11346.9(a)(1) requires an update of the information contained in the Initial Statement of Reasons. If the update identifies any data or any technical, theoretical or empirical study, report, or similar document on which the state agency is relying that was not identified in the Initial Statement of Reasons, the state agency shall comply with Government Code Section 11347.1.

The Department of Housing and Community Development (HCD) has not added any data (including technical, theoretical, or empirical studies, reports, or similar documents relied upon) that would necessitate an update of the information contained in the Initial Statement of Reasons.

MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS

Pursuant to Government Code Section 11346.9(a)(2), if the determination as to whether the proposed action would impose a mandate, the agency shall state whether the mandate is reimbursable pursuant to Part 7 of Division 4. If the agency finds that the mandate is not reimbursable, it shall state the reasons for the finding(s).

HCD has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts.

OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATION(S).

Government Code Section 11346.9(a)(3) requires a summary of each objection or recommendation regarding the specific adoption, amendment, or repeal proposed, and an explanation of how the proposed action was changed to accommodate each objection or recommendation, or the reasons for making no change. This requirement applies only to objections or recommendations specifically directed at the agency's proposed action or to the procedures followed by the agency in proposing or adopting the action, or reasons for

making no change. Irrelevant or repetitive comments may be aggregated and summarized as a group.

Proposed changes were made available to the public for a 45-day comment period from April 17, 2026, until June 1, 2026. A total of two (2) comments were received during the 45-day comment period. One (1) comment was not specific to HCD's proposed amendments but is included within a separate general section of this document. HCD acknowledged all comments received during the specified public comment period.

COMMENTS RECEIVED DURING THE 45-DAY PUBLIC COMMENT PERIOD

Comment 1 ITEMS 1-5

Commenter(s) and Recommendation:

California Building Industry Association; California Apartment Association; California Business Properties Association; and Business Owners and Managers Association.

The commenter supports the adoption of HCD's proposed changes to the 2025 California Building Code, part 2; California Electrical Code, part 3; California Mechanical Code, part 4; and California Plumbing Code, part 5, items 1-5.

Agency Response:

HCD appreciates the commenters' support for the proposed amendments.

COMMENTS RECEIVED THAT WERE BEYOND SCOPE OF THE 45-DAY EXPRESS TERMS

Comment 2 General.

Commenter(s) and Recommendation:

Vince Pastore.

The commenter requests that HCD establish a permit-free whole-house greywater category for low-flow residential systems and align regulatory requirements with actual risk rather than fixture type. Additionally, the commenter suggests that HCD expand simplified compliance pathways beyond laundry-only systems and provide clear prescriptive standards to ensure safe implementation.

Agency Response:

HCD appreciates the feedback and recommendations provided by the commenter. After review, HCD determined that no changes will be made, as the suggestions are beyond the scope of the current proposals and were not developed in coordination with all stakeholders. Assembly Bill 130 (Chapter 22, Statutes of 2025) (AB 130), provides limited exceptions for changes to state building standards that occur during intervening code adoption cycles, in perpetuity and for all occupancies. AB 130 also enacted a pause during triennial code adoption cycles on changes to state building standards

impacting residential occupancies, with limited exceptions. The commenter's proposal is substantive and would materially alter the substance/intent of the existing code provisions. HCD may engage in this topic during a future code adoption cycle, pursuant to applicable statutory directives.

DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS

Government Code Section 11346.9(a)(4) requires a determination with supporting information 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 adopted regulation, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

HCD has determined that no reasonable alternative considered by HCD, or that has otherwise been identified and brought to the attention of HCD, would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:

Government Code Section 11346.9(a)(5) requires an explanation setting forth the reasons for rejecting any proposed alternatives that would lessen the adverse economic impact on small businesses, including the benefits of the proposed regulation per 11346.5(a)(3).

No alternatives were identified to lessen the adverse economic impact on small businesses.