

**INITIAL 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 (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.

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**INITIAL STATEMENT OF REASONS**

**ITEM 1**

**2025 CALIFORNIA BUILDING CODE, PART 2**

**Chapter 1, Scope and Administration, Division I, California Administration, Section 1.8.2.1.2 Housing accessibility.**

HCD proposes to continue to adopt the above referenced section with amendments as follows:

**Rationale:** During the 2024 Triennial Code Adoption Cycle, HCD coordinated with the Division of the State Architect to amend Chapter 11A, Sections 1101A.1 and 1102A.1 and removed references in the scope and application of Chapter 11A to public housing. However, the reference in Chapter 1, Section 1.8.2.1.2, was inadvertently left in place. This amendment ensures consistency between Section 1.8.2.1.2 and the updated scope and application of Chapter 11A in the 2025 California Building Code.

Assembly Bill 130 (Chapter 22, Statutes of 2025) places strict limitations on what the state can consider during this Intervening Code Adoption Cycle, including the categories of amendments that are permitted during the Intervening Code Adoption Cycle pursuant to California Health and Safety Code (HSC) section 18942(a)(2). HCD has determined that the proposed changes are permissible under Health and Safety Code (HSC) section 18942(a)(2)(A) pertaining to technical updates to existing code requirements that are needed to effectuate or facilitate their incorporation or implementation since they are “clarifying, conforming, or coordinating changes that do not materially alter the substance or intent of the existing code provisions.” This proposal has no intended change in regulatory effect.

**CAC Recommendation:**

Approve.

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**Agency Response:**

Accept.

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**ITEM 2**  
**2025 CALIFORNIA BUILDING CODE, PART 2**

**Chapter 2, Section 202, Definitions.**

HCD proposes to repeal the adoption of the definition of public housing in the above referenced section. The definition is not proposed to be deleted from the code as it is still adopted by another agency, but it will no longer be adopted by HCD.

**Rationale:** HCD proposes to no longer adopt the definition of “public housing”. Government Code Section 12955.1 provides direction for HCD to propose adoption of building standards necessary to prohibit discrimination in the design and construction of all housing other than publicly funded housing which is under the authority of the Division of the State Architect (DSA). Currently, HCD co-adopts the definition of “public housing” with DSA.

During the 2024 Triennial Code Adoption Cycle, HCD removed references to public housing in the scope and application of Chapter 11A. As a result, HCD no longer needs to maintain the co-adoption of the definition of “public housing”.

Assembly Bill 130 (Chapter 22, Statutes of 2025) places strict limitations on what the state can consider during this Intervening Code Adoption Cycle, including the categories of amendments that are permitted during the Intervening Code Adoption Cycle pursuant to HSC section 18942(a)(2). HCD has determined that the proposed changes are permissible under HSC section 18942(a)(2)(A) pertaining to technical updates to existing code requirements that are needed to effectuate or facilitate their incorporation or implementation since they are “clarifying, conforming, or coordinating changes that do not materially alter the substance or intent of the existing code provisions.” This proposal has no intended change in regulatory effect.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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**ITEM 3**  
**2025 CALIFORNIA ELECTRICAL CODE, PART 3**

**Article 89 General Code Provisions, Section 89.108.2.1.2 Housing accessibility.**

HCD proposes to continue to adopt the above referenced section with amendments as follows:

**Rationale:** During the 2024 Triennial Code Adoption Cycle, HCD coordinated with the Division for the State Architect to amend Chapter 11A, Sections 1101A.1 and 1102A.1 and removed references in the scope and application of Chapter 11A to public housing. However, the reference in Article 89, Section 89.108.2.1.2, was inadvertently left in place. This amendment ensures consistency between Section 89.108.2.1.2 and the updated scope and application of Chapter 11A in the 2025 California Building Code.

Assembly Bill 130 (Chapter 22, Statutes of 2025) places strict limitations on what the state can consider during this Intervening Code Adoption Cycle, including the categories of amendments that are permitted during the Intervening Code Adoption Cycle pursuant to HSC section 18942(a)(2). HCD has determined that the proposed changes are permissible under HSC section 18942(a)(2)(A) pertaining to technical updates to existing code requirements that are needed to effectuate or facilitate their incorporation or implementation since they are “clarifying, conforming, or coordinating changes that do not materially alter the substance or intent of the existing code provisions.” This proposal has no intended change in regulatory effect.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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**ITEM 4**  
**2025 CALIFORNIA MECHANICAL CODE, PART 4**

**Chapter 1, Scope and Administration, Division I, California Administration, Section 1.8.2.1.2 Housing accessibility.**

HCD proposes to continue to adopt the above referenced section with amendments as follows:

**Rationale:** During the 2024 Triennial Code Adoption Cycle, HCD coordinated with the Division of the State Architect to amend Chapter 11A, Sections 1101A.1 and 1102A.1 and removed references in the scope and application of Chapter 11A to public housing. However, the reference in Chapter 1, Section 1.8.2.1.2, was inadvertently left in place. This amendment ensures consistency between Section 1.8.2.1.2 and the updated scope and application of Chapter 11A in the 2025 California Building Code.

Assembly Bill 130 (Chapter 22, Statutes of 2025) places strict limitations on what the state can consider during this Intervening Code Adoption Cycle, including the categories of amendments that are permitted during the Intervening Code Adoption Cycle pursuant to HSC section 18942(a)(2). HCD has determined that the proposed changes are permissible under HSC section 18942(a)(2)(A) pertaining to technical updates to existing code requirements that are needed to effectuate or facilitate their incorporation or implementation since they are “clarifying, conforming, or coordinating changes that do not materially alter the substance or intent of the existing code provisions.” This proposal has no intended change in regulatory effect.

**CAC Recommendation:**

Approve.

**Agency Response:**

Accept.

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**ITEM 5**  
**2025 CALIFORNIA PLUMBING CODE, PART 5**

**Chapter 1, Scope and Administration, Division I, California Administration, Section**

### 1.8.2.1.2 Housing accessibility.

HCD proposes to continue to adopt the above referenced section with amendments as follows:

**Rationale:** During the 2024 Triennial Code Adoption Cycle, HCD coordinated with the Division of the State Architect to amend Chapter 11A, Sections 1101A.1 and 1102A.1 and removed references in the scope and application of Chapter 11A to public housing. However, the reference in Chapter 1, Section 1.8.2.1.2, was inadvertently left in place. This amendment ensures consistency between Section 1.8.2.1.2 and the updated scope and application of Chapter 11A in the 2025 California Building Code.

Assembly Bill 130 (Chapter 22, Statutes of 2025) places strict limitations on what the state can consider during this Intervening Code Adoption Cycle, including the categories of amendments that are permitted during the Intervening Code Adoption Cycle pursuant to HSC section 18942(a)(2). HCD has determined that the proposed changes are permissible under HSC section 18942(a)(2)(A) pertaining to technical updates to existing code requirements that are needed to effectuate or facilitate their incorporation or implementation since they are “clarifying, conforming, or coordinating changes that do not materially alter the substance or intent of the existing code provisions.” This proposal has no intended change in regulatory effect.

#### **CAC Recommendation:**

Approve.

#### **Agency Response:**

Accept.

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## **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 proposed amendments do not introduce new mandates or prescriptive standards and have no intended change in regulatory effect.

Assembly Bill 130 (Chapter 22, Statutes of 2025) places strict limitations on what the State can consider during this Intervening Code Adoption Cycle. HCD has determined that the proposed changes are permissible under Health and Safety Code Section 18942(a)(2)(A).

## **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)

### **A. The creation or elimination of jobs within the State of California.**

These regulations will not affect the creation, nor 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, nor cause the elimination, of 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 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.**

These regulations benefit California residents by ensuring consistency in the code and eliminating possible confusion which leads to protection of public health and safety, worker safety, and the environment

**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).

- [Fair Housing Act Design Manual \(huduser.gov\)](http://huduser.gov)

**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.

There were no feasible alternatives available to HCD. There is no intended change in regulatory effect and the proposed amendments do not materially alter the substance or intent of the existing code provisions and are necessary for a complete 2025 CBC, CEC, CMC and CPC.

**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.

None. There are no changes from the existing regulations in the CBC, CEC, CMC and CPC, other than those proposed changes for editorial and clarification purposes.

**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 proposed amendments are limited to clarifying, conforming, and coordinating changes, or correcting an oversight, and do not materially alter the substance or intent of existing code provisions. Therefore, no additional facts, evidence, documents, testimony,

or other supporting information are relied upon by HCD to make its initial determination of no significant adverse economic impact on business pursuant to Government Code Section 11346.2(b)(5)(A).

The public is invited to submit any relevant information, facts, or documents that either support this determination or provide evidence to the contrary.

### **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.

- There is no anticipated increased cost of compliance for the proposed California amendments as they are limited to technical, editorial, and clarification changes that do not alter regulatory requirements or construction practices.

### **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.