

**NINE-POINT CRITERIA ANALYSIS  
FOR PROPOSED BUILDING STANDARDS  
OF THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY  
DEVELOPMENT  
REGARDING THE 2025 CALIFORNIA EXISTING BUILDING CODE,  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 10  
(HCD 06/24)**

Building standards submitted to the California Building Standards Commission (CBSC) for approval are required by Health and Safety Code Subsection 18930(a) to be accompanied by an analysis which will, to the satisfaction of CBSC, justify their approval. The approval of these proposed building standards is justified as follows:

**18930(a)(1)**

***The proposed building standards do not conflict with, overlap, or duplicate other building standards.***

The California Department of Housing and Community Development (HCD) has determined that the proposed changes to the 2025 California Existing Building Code (CEBC), California Code of Regulations (CCR), title 24, part 10, do not conflict with, overlap, or duplicate other building standards.

**18930(a)(2)**

***The proposed building standards are within the parameters established by enabling legislation, and are not expressly within the exclusive jurisdiction of another agency.***

HCD has determined that the proposed building standards are within the parameters of HCD's purview over residential construction.

**18930(a)(3)**

***The public interest requires the adoption of the building standards. The public interest includes, but is not limited to, health and safety, resource efficiency, fire safety, seismic safety, building and building system performance, and consistency with environmental, public health, and accessibility statutes and regulations.***

HSC, section 17921, directs HCD to propose the adoption, amendment, or repeal of building standards into CCR, title 24 for the protection of public health, safety, and general welfare of the occupant and the public.

**18930(a)(4)**

***The proposed building standards are not unreasonable, arbitrary, unfair, or capricious, in whole or in part.***

HCD has determined that the proposed building standards are not unreasonable, arbitrary, or capricious, in whole or in part.

**18930(a)(5)**

***The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.***

HCD does not anticipate any increased cost from the proposed regulations.

**18930(a)(6)**

***The proposed building standards are not unnecessarily ambiguous or vague, in whole or in part.***

HCD has determined that the proposed building standards and amendments to part 10 of the 2025 CEBC are neither ambiguous nor vague, either in whole or in part. The language of the California amendments was developed, reviewed, and edited to avoid ambiguity or vagueness.

**18930(a)(7)**

***The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.***

***18930(a)(7)(A). If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.***

***18930(a)(7)(B). If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.***

HCD is required to review the 2024 International Existing Building Code (IEBC) and, if appropriate, to include California amendments, which are necessary modifications to the model code language or to incorporate provisions of state and federal laws. As part of the current 2024 Triennial Code Adoption Cycle, HCD proposes to adopt the 2024 IEBC, with California amendments, as part of the 2025 CEBC.

**18930(a)(8)**

***The format of the proposed building standards is consistent with that adopted by CBSC.***

HCD is using the format consistent with that adopted by the CBSC.

**18930(a)(9)**

***The proposed building standards, if they promote fire and panic safety as determined by the State Fire Marshal, have the written approval of the State Fire Marshal.***

The proposed adoption of the 2025 CEBC, CCR, title 24, part 10, is subject to review by the State Fire Marshal. HCD submitted a copy of the CEBC regulations to the SFM and requested a written approval that was received on December 18, 2024.