

**NINE-POINT CRITERIA ANALYSIS  
FOR PROPOSED BUILDING STANDARDS  
OF THE DEPARTMENT OF CONSUMER AFFAIRS – VETERINARY MEDICAL BOARD  
REGARDING THE 2025 CALIFORNIA BUILDING CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2, CHAPTER 12  
(DCA 01/24)**

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 Veterinary Medical Board's (Board) proposed changes to the 2025 California Code of Regulations (CCR), Title 24, California Building Code (CBC), Part 2, Chapter 12 (Interior Environment), Section 1251, along with separate proposed changes (via the Office of Administrative Law rulemaking process) to CCR, Title 16, Sections 2030 through 2030.3, will eliminate overlap and duplication and ensure that building standards pertaining to veterinary premises are found only under Title 24 of the CCR, while practice management standards pertaining to veterinary premises are found under Title 16 of the CCR.

**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.***

The Board has determined that the proposed building standards and related exemptions are within the parameters established by enabling legislation. Additionally, the proposed building standards, as applicable to veterinary premises, are not within the exclusive jurisdiction of another agency.

**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.***

The Board has determined that the proposed building standards promote the health and safety of animal patients being treated or housed in veterinary premises.

**18930(a)(4)**

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

The Board 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.***

The Board is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

**18930(a)(6)**

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

The Board has determined that the proposed building standards are not unnecessarily ambiguous or vague, in whole or in part.

**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.***

The Board has determined that there are no applicable national specifications, published standards, or model codes to be incorporated.

**18930(a)(8)**

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

The Board is using a 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.***

Pending review by the State Fire Marshal for determination whether these proposed building standards promote fire and panic safety.