

City of Piedmont
COUNCIL AGENDA REPORT

DATE: November 17, 2025

TO: Mayor and Council

FROM: Rosanna Bayon Moore, City Administrator

SUBJECT: Introduction and First Reading of Ordinance 786 N.S. Repealing and Replacing Division 8.02 [Adoption of California Building Standards Code and Amendments] of the Piedmont City Code by Adopting by Reference the 2025 California Building Standards Code (Title 24, California Code of Regulations Parts 1, 2, 2.5, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12), Together With Local Amendments to Parts 2, 2.5, 3, 4, 5, 6, 7, 9 and 11

RECOMMENDATION:

Conduct a first reading of Ordinance 786 N.S.:

- 1) Amending division 8.02 of the Piedmont City Code to adopt the 2025 California Code of Regulations, Title 24, including the California Administrative, Building, Residential, Mechanical, Plumbing, Electrical, Energy, Wildland Urban Interface, Fire, Green Building Standards, Reference Standards, Historical Building and Existing Building Codes, with local amendments to Parts 2, 2.5, 3, 4, 5, 6, 7, 9 and 11, making required findings related to the climatic, geological and topographical conditions warranting more stringent local requirements.
- 2) Adopting local amendments to Parts 3 and 6 of the California Building Standards Code with requirements for Energy Efficiency Measures for Existing Single-Family Buildings, making required cost-effectiveness findings, and
- 3) Determining that the Ordinance is Exempt from CEQA and from AB 130.

EXECUTIVE SUMMARY:

Every three years, the California Code of Regulations (“State Code”) provided by the International Code Council (ICC) and the California Building Standards Commission (CBSC) are updated. Local jurisdictions, including the City of Piedmont, are required to adopt the state building standards, but can also adopt more restrictive amendments warranted by local climatic, geological or topographical conditions.

Staff is recommending adoption of the 2025 California Building Standards Code and other related California codes with amendments specific to Piedmont, including updates to the previously adopted energy efficiency Reach Codes for existing single-family residential buildings. Any

revisions to amendments previously in effect or any new amendments related to home hardening are described in the Summary of Revisions section of this report in recognition that the Council may want to concentrate its attention on proposed revisions to current regulations and not necessarily local amendments that carry forward from previous Code adoptions unchanged.

BACKGROUND:

The building codes are written to set minimum standards for design and construction of new buildings, additions and alterations. The codes protect the health, safety and welfare of the building occupants, provide barrier-free accessibility of its users, and set performance standards for building energy efficiency. The ICC publishes the model code, which the CBSC reviews and revises with the California amendments. Local jurisdictions are required to adopt the State's building standards and can add more restrictive amendments based upon findings that such amendments are warranted by local climatic, geological or topographical conditions. Thus, the Piedmont Building Code is the California Building Code with the City of Piedmont amendments. This code adoption cycle repeats itself every three years.

The Piedmont amendments were created to bring a greater level of safety to residents, reduce potential life and property loss, and advance implementation of the City's Climate Action Plan (CAP) 2.0 and the General Plan's Natural Resources and Sustainability Element in the form of energy efficiency Reach Codes.

Changes and updates to the code provided in Chapter 8 are shown in Exhibit A to the Ordinance.

California Health and Safety Code Section 17958.7 requires that when a city council adopts more stringent building standards than those adopted by the State, the council must make findings for each such amendment based on local climatic, topographical, or geological conditions. The required findings relating to specific conditions in the City of Piedmont are contained in the proposed Ordinance.

It should be noted that a majority of the proposed Piedmont amendments are the same as in previous code updates and represent a re-adoption of them for this code cycle. The changes are to update Piedmont's amendments to match the updates to the 2026 State Codes, to locate the amendments into more applicable code sections for accuracy and clarification, and to eliminate amendments that are no longer relevant due to updates in the State Code. The proposed Piedmont amendments will have negligible effect on the way the City currently operates or the way applicants comply with City Code Chapter 8, Building, Construction and Fire Prevention.

Energy Efficiency Reach Codes

Reach Codes are cost-effective local amendments that exceed the energy efficiency established in the 2025 California Energy Code. Reach Codes must cost-effectively establish greater energy efficiency standards and reduce the carbon emissions of buildings. The California Energy Commission (CEC) determines cost effectiveness and approves Reach Codes before they come into effect. Cost effectiveness is determined by either incremental cost savings to the homeowner over the useful life of the measure or by system-wide cost savings related to energy production, generation, and distribution during peak periods.

In February 2021, the City Council approved Ordinance 751 N.S., adopting Piedmont's first-ever Reach Codes. Piedmont was one of the first in the State to adopt Reach Codes for new and existing residential buildings. In 2022, the City Council approved Ordinance 766 N.S., readopting Reach Codes in alignment with the 2022 State Code update for new and existing single-family buildings, which came into effect January 25, 2023. In September 2024, the City Council adopted Ordinance 775 N.S. to repeal Reach Codes related to all-electric construction in new or existing single-family residential buildings in compliance with federal case law.

SUMMARY OF REVISIONS:

California Code Changes

There are several routine updates to the 2025 California Residential Code which apply to one- and two-family dwellings, and the 2025 California Building Code which apply to all other types of buildings. These are changes to the State Building Code, and not the City's local amendments.

Changes of note are:

- a) The removal of the exterior fire requirements from the CRC and CBC and the inclusion of them in the newly created Part 7, Wildland-Urban Interface Code, of the 2025 California Building Standards Code.
- b) Section R103 is updated to use common compliance language to rename the Department of Building Safety to the Code Compliance Agency.
- c) The definition of Rainscreen system includes an airspace behind the cladding.
- d) Chapter 3 of the residential building code is reorganized.
- e) Anchorage requirements are expanded to include seismic restraint for all appliances needing seismic restraint and not solely water heaters and thermal storage units.
- f) Clarification is provided for determining fire separation distance; dwellings and townhouses on the same lot shall be assumed to have an imaginary line between them.
- g) A new definition and provisions for sleeping lofts are added to the Code.
- h) Light and ventilation are separated into their own sections.
- i) Openings and penetrations in locations housing an energy storage system (ESS) shall be protected similarly to garages (Piedmont has made local amendment in this section to further clarify ESS locations).
- j) Specific requirements for flashing detailing at deck ledgers are added to the deck section.
- k) Habitable space can be created in existing attics and basements if the ceiling height is at least 6 feet, 8 inches. Bathrooms and laundry rooms must have a ceiling height of at least 6 feet 4 inches. Additions and new construction still need to meet the minimum 7 foot requirement.

Piedmont City Code Section 8.02.010 is proposed to be revised to adopt the 2025 California Building Standards Code, California Code of Regulations, Title 24, together with local amendments, as more specifically identified below:

- A. 2025 California Residential Code, Part 2.5 of Title 24 of the California Code of Regulations, including Appendices BB, BF, BG, BJ, BK, BL, BO, CI, and CJ.

- B. 2025 California Building Code, Part 2 of Title 24 of the California Code of Regulations, Volumes 1 and 2 and Appendices H, I, J, P and Q.
- C. 2025 California Mechanical Code, Part 4 of Title 24 of the California Code of Regulations, including its appendices.
- D. 2025 California Plumbing Code, Part 5 of Title 24 of the California Code of Regulations, and its appendices.
- E. 2025 California Electrical Code, Part 3 of Title 24 of the California Code of Regulations, and its annexes.
- F. 2025 California Energy Code, Part 6 of Title 24 of the California Code of Regulations including all of its appendices.
- G. 2025 California Green Building Standards Code, Part 11 of Title 24 of the California Code of Regulations, including all of its appendices.
- H. 2025 California Referenced Standards Code, Part 12 of Title 24 of the California Code of Regulations, including all of its appendices.
- I. 2025 California Administrative Code, Part 1 of Title 24 of the California Code of Regulations, and its appendices.
- J. 2025 California Historical Building Code, Part 8 of Title 24 of the California Code of Regulations, including all of its appendices.
- K. 2025 California Existing Building Code, Part 10 of Title 24 of the California Code of Regulations, including its appendices.
- L. 2025 California Fire Code, Part 9 of Title 24 of the California Code of Regulations, as adopted and/or amended by the office of the California State Fire Marshal, including Appendices B, C, D, E, H, I, L, and N.
- M. 2025 California Wildland-Urban Interface Code, Part 7 of Title 24 of the California Code of Regulations, as adopted and/or amended by the office of the California State Fire Marshal, including Appendices F, and G.

Changes to Local Amendments to the California Code

Generally, the Piedmont local amendments to the State Code Parts 2, 2.5, 3, 4, 5, 6, 7, 9, and 11, and as found in City Code division 8.02, remain substantially equivalent as adopted by City Council for the 2022 code cycle and were all in effect as of either January 1 or January 25, 2023. Where minor revisions have been made to local amendments that were in effect as of either January 1 or January 25, 2023, those amendments remain substantially equivalent with no material change in regulatory effect and are outlined below with a brief explanation of their revisions. Also summarized below are new amendments that relate to home hardening.

New amendments related to home hardening are as follows:

- *Section R310.6 Power Source* is amended to require a hard-wired smoke alarm if the project includes a full house re-wire as an effort to increase home hardening. See Piedmont City Code section 8.02.020.K.
- Amendments to *Section R330.4 Locations* clarifies the clearance of an Energy Storage System (ESS) or Battery to be 3ft from any opening into the house, basement, crawlspace or property line as an effort to increase home hardening. Additionally, it requires a disconnect for the battery at the main electric panel for emergency personnel. See Piedmont City Code section 8.02.020.P.
- Amendments to *Section R408.2 Openings for Underfloor Ventilation* of the California Residential Building Code are revised to clarify that replaced vents are required to meet WUI standards as an effort to increase home hardening. See Piedmont City Code sections 8.02.020.V.
- Amendments to *Section R908.1 General* of the California Residential Building Code are updated to clarify that when a roof is replaced, it shall meet WUI requirements and that roof ventilation be provided and meet WUI venting requirements as an effort to increase home hardening. See Piedmont City Code section 8.02.020.AA.
- Amendments to *Section 101.3.1 Application* of the California Wildland-Urban Interface Code (Part 7) are amended to delete the exemption of additions to and remodels of buildings originally built before 2008 to comply with Part 7. This will allow part 7 to be applied to additions and remodels for the majority of the housing stock in Piedmont as an effort to increase home hardening. See Piedmont City Code section 8.02.100.A.

Previously adopted amendments that will not carry over to the 2025 State Code are as follows:

- Amendments to *Section R337.1.5 Vegetation Management Compliance*, *Section R337.2 Definitions of the California Residential Building Code* and *Section 701A.5 Vegetation management compliance* and *Section 702A Definitions* of the California Building Code have been deleted as those sections have been removed from the State Code and added to a new Wildland Urban Interface Code (Part 7). The City amendments are no longer required as the code sections satisfactorily address the City's concerns for fire safety under the designation of the city as a WUI area. See deleted Piedmont City Code sections 8.02.020.Q. and 8.02.030.F.
- Amendments to *Section R902.1 Roof Covering Materials* of the California Residential Building Code are deleted since the City is under the WUI designation and all roofing must be class A. There is no need to amend this section of the code any longer. See the deletion of Piedmont City Code section 8.02.020.Y.

- Amendments to Section 150.2(a) – Additions are removed as, established in the memo entitle “Application of the 2022 Studies to the 2025 Energy Code: Existing Single Family Building Upgrades” prepared by Frontier Energy, Inc. and Misti Brucerri & Associates, LLC, solar photovoltaics no longer meet CEC cost effectiveness requirements. See deletion of Piedmont City Code section 8.02.070.B.

Substantially equivalent amendments in effect before September 30, 2025 with minor revisions are as follows:

- Amendments to *Section R105.2 Work Exempt from Permits* of the California Residential Building Code and *Section 105.2 Work Exempt from Permits* of the California Building Code in effect as of January 1, 2023, are revised to include new language from the State Code to require that detached accessory structures such as tool sheds that are less than 120 square feet are subject to wildland-urban interface (WUI) requirements as an effort to increase home hardening. See Piedmont City Code sections 8.02.020.B.1 and 8.02.030.B.1.
- Amendments to *Section R308.1 Address Identification*, in effect as of January 1, 2023, of the California Residential Building Code have been updated to align with the State Code and to clarify that accessory dwelling units must also be identified. See Piedmont City Code section 8.02.020.H.
- Amendments to *Section R325 Light, Ventilation and Heating* have been split into multiple sections to reflect updates in the California Residential Building Code (Part 2.5): *Section R325.1.1 Natural Light* and *R325.1.2 Natural Ventilation*. Amendments have been adjusted to delete the exception for artificial light and mechanical ventilation as in previous code amendments, in effect as of January 1, 2023. See the deletions in Piedmont City Code section 8.02.020.N and O.
- Amendments to *Section R405.1 Concrete or Masonry Foundations*, of the California Residential Building Code, in effect as of January 1, 2023, are updated to align with State Code. See Piedmont City Code section 8.02.020.U.
- Amendments to *Section R703.6 Wood Shakes and Shingles* of the California Residential Building Code, in effect as of January 1, 2023 are updated to clarify that when 50% of wood shingle or shake siding is replaced on a given wall face, that the entire face must be compliant with WUI. In addition, this increases when the requirement is activated from 25% to 50% of replacement. See Piedmont City Code section 8.02.020.X.
- Amendments to *Appendix Section AK105 Mechanically Generated Noise Sources* of the California Residential Building Code, in effect as of January 1, 2023, were relocated within the California Residential Building to *Appendix Section BG105* to match the changes in the State Code. See Piedmont City Code section 8.02.030.CC.

Substantially equivalent amendments in effect before September 30, 2025 with minor revisions and align with an adopted General Plan and greenhouse gas emission reduction plan are as follows:

- Amendments to *Section R106 Construction Documents* of the California Residential Building Code, in effect as of January 1, 2023, are relocated and moved to *Section 100.0 and Section 100.1(b)* of the California Energy Code. This is an effort to clarify and consolidate energy efficiency Reach Codes within the California Energy Code. See the deletions immediately after Piedmont City Code sections 8.02.020.C for the deletion and 8.02.070 for the addition.
- Amendments to *R106.6 Renovation Energy Efficiency Upgrades and Electrification* in effect as of January 25, 2023, are revised and relocated within the State Code from California Residential Code Section *R106.6* to California Energy Code (Part 6) *Section 150.2(d)*. See Piedmont City Code section 8.02.020.C for the deletion and 8.02.070 for the addition.

Revisions to this amendment aim to:

- Give residents more options to comply with the Reach Code.
- Ensure the Reach Code is consistent with existing City Code, best practice, and CEC energy efficiency and cost effectiveness requirements. According to CEC requirements, when the Reach Code offers a menu of options, at least one menu item must be cost effective.
- Promote the uptake of menu items that result in higher annual energy savings, as determined by the Flexibility Score in the [Cost Effectiveness Explorer tool](#), City of Piedmont study results. The tool was developed by the California Statewide Codes & Standards Program, Reach Codes Subprogram to help cities establish Reach Codes in compliance with CEC requirements. Any menu item with a Flexibility Score over 10 was deemed as high energy impact. Any menu item with a Flexibility Score of less than 2 was removed from the list.

To meet these aims, the proposed revisions are to:

1. Amend Section 150.2 (a) Additions and 150.2 (b) Alternation to include the addition of 150.2 (d).
2. Increase project value thresholds for alterations or additions to single-family buildings (an increase from \$30,000 to \$35,000; an increase from \$115,000 to \$135,000) to reflect current cost trends for construction trade labor and materials based upon the California Construction Cost Index published by the California Department of General Services.
3. Update energy efficiency standards to meet CEC requirements for cost effectiveness and energy efficiency.
4. Add four new menu items to give residents more options to comply.
5. Add an option for projects over the \$135,000 threshold to comply by either choosing two menu items or to comply by choosing only one menu item determined to have high annual energy savings based on their Flexibility Score and marked as **high energy impact*.
6. Remove the menu item “to replace all screw in incandescent and compact fluorescent lamps (CFLs) with screw in light-emitting diode (LED) lamps.” According to the Cost Effectiveness Explorer tool, this item has a Flexibility Score of ~0 and minimal greenhouse gas emissions reduction impact, when compared to

the other items on the menu. Upgrades are also largely being addressed by the free market as well as State and federal legislation, which has limited or banned the sale of incandescent and CFL bulbs (e.g. AB 2208 banned the sale of screw-in CFLs as of January 1, 2024). The remaining menu items still offer several options that are cost effective and have incremental costs lower than \$3,500 (10% of the lower project value threshold).

PUBLIC ENGAGEMENT

In-person public engagement for the 2025 State Code update, including proposed local amendments and Reach Codes, occurred in August 2025 at the in-person Planning and Building Open House event and in September 2025 at the Piedmont Harvest Festival.

The City also conducted a public survey from September through October 2025 to give residents an opportunity to provide feedback on their experiences with the Reach Code “*Renovation Energy Efficiency Upgrades and Electrification*” which requires property owners to choose energy efficiency measures from a menu of items when completing large renovation projects. The survey was promoted through the City’s communications channels and local newspapers. Key insights from 20 responses are:

1. There is interest in more ways for property owners to meet 2025 Reach Codes update requirements.e .
2. Respondents would prioritize adding certain energy efficiency measures that are easy to implement with lower capital costs.
3. Compliance exceptions that acknowledge property owners who have already invested in energy efficiency measures from the menu should be recognized.

Exceptions to the energy efficiency Reach Code related to the last insight are already embedded and include allowances for property owners to demonstrate existing efforts through a Home Energy Score report (roughly \$200 - \$400 in cost) or to seek an exception if all available measures exceed 20% of project costs.

CONSISTENCY WITH GENERAL PLAN AND CLIMATE ACTION PLAN 2.0 GOALS

The adoption of local amendments related to energy efficiency Reach Codes is consistent with several priorities established in the City’s General Plan’s Natural Resources and Sustainability Element, General Plan’s Environmental Hazard Element, and the Climate Action Plan 2.0. In the General Plan, the Natural Resources and Sustainability Element states that “sustainability is one of the overarching goals of this General Plan” and that the reduction of GHG emissions is a key component of ensuring a sustainable future for Piedmont. These local amendments permit mixed-fuel residential construction consistent with federal law while also incentivizing all-electric construction by providing a menu of energy efficiency and electrification options, as well as electric ready requirements, and as part of a greenhouse gas emissions reduction strategy: Piedmont’s Climate Action Plan 2.0, adopted on March 19, 2018.

The Natural Resources and Sustainability Element of the General Plan

The General Plan was adopted by the City Council on April 6, 2009. The Natural Resources and Sustainability Element states that “sustainability is one of the overarching goals of this General Plan” and that the reduction of greenhouse gas (GHG) emissions is a key component of ensuring a sustainable future for Piedmont. The Element also establishes policies and actions directly aimed at energy conservation and incentivizing all-electric construction while permitting mixed-fuel residential construction consistent with federal law, outlined below:

Policy 16.7: Greenhouse Gas Emissions Reductions

Single-family and multi-family development projects shall be encouraged to not include natural gas appliances or natural gas plumbing...

Action 16.B: Building Code Amendments. Regularly evaluate any obstacles to sustainable building construction in Piedmont. Periodically amend the building code to incorporate green building principles, respond to changes in State law which promote green building, and match the steps being taken by nearby Alameda County cities to encourage sustainable construction.

Policy 17.2: Energy Conservation

Strongly advocate for increased energy conservation by Piedmont residents, businesses, and other public agencies such as the Piedmont Unified School District.

Policy 17.3: Alternative Energy Sources Encourage the use of alternative energy sources, such as solar power and wind energy, by Piedmont residents.

The Environmental Hazards Element notes that GHG emissions cause climate change, which contributed to natural hazards, and that “in 2015, the three largest sources of GHG emissions in Piedmont were building electricity use, natural gas use for space and water heating, and petroleum-fueled personal vehicle use.”

Climate Action Plan 2.0

The Piedmont Climate Action Plan (CAP) 2.0 was adopted by City Council on March 19, 2018. The CAP 2.0 lays out goals and actions that can be taken to achieve the following City Council adopted goals:

1. Achieve municipal- and community-scale carbon neutrality by no later than the year 2045, and transition to a post-carbon community.
2. Achieve an interim target of 50% emissions reductions from a 2005 baseline emissions level by the year 2030.

To monitor progress toward these goals, City staff conduct an annual GHG emissions inventory, which consistently demonstrates that energy consumption from residential energy contributes nearly half of all in-territory emissions. Therefore, any path to achieving the City’s climate action goals will require increasing the energy efficiency of Piedmont’s home and encouraging the uptake of electric appliances that are powered by 100% renewably sourced electricity.

ASSEMBLY BILL (AB) 130

On June 30, 2025, the State Legislature adopted AB 130, which suspends the adoption of local amendments to the building residential code from October 1, 2025 to June 1, 2031. Through AB 130, cities and counties can only adopt local amendments if at least one of five exceptions are met. Each of the proposed local residential amendments to Parts 2, 2.5, 3, 4, 5, 6, 7, 9, and 11 of the 2025 California Building Standards Code meet at least one of the following exceptions:

1. Amendments are substantially equivalent to changes or modifications that were previously filed by the city or county and were in effect as of January 1, September 30, 2025. The re-enactment of proposed amendments has no material change in regulatory effect, and the continued adoption is necessary to maintain consistency with existing local standards that protect the public health, safety, and welfare.
2. Amendments relate to home hardening.
3. Amendments are necessary to implement a local code amendment that is adopted to align with a general plan approved on or before June 10, 2025, and that permits mixed-fuel residential construction consistent with federal law while also incentivizing all-electric construction as part of an adopted GHG emissions reduction strategy.

CEQA:

The ordinance and the code revisions included within it are exempt from environmental review pursuant to Title 14 California Code of Regulations, section 15061(b)(3).

REVIEW BY CITY ATTORNEY:

The proposed modifications to the City Code, the ordinance and the CEQA determinations have been reviewed by the City Attorney.

CONCLUSION, COUNCIL ACTION AND NEXT STEPS:

The recommended Code revisions bring the City's regulations for building safety into compliance with State Codes with amendments that are specific to ensuring building safety in Piedmont. Staff also recommend adoption of the proposed Reach Codes for Council's consideration, which contain minor changes to the previously adopted Reach Codes, as well as give residents more choices to comply. The Reach Codes help residents reduce their building energy use and, as a result, reduce long-term energy costs and directly reduce building-related GHG emissions within Piedmont. Reach Codes are an effective means by which the Piedmont community can achieve its climate action goals.

Any approved Reach Codes must be submitted to the California Energy Commission (CEC) for certification before they can be enforced. That process is expected to take about three months from the date of submission. City staff plan to submit the amendments to the CEC shortly after a second reading of the ordinance. Once the CEC approves the Reach Codes, City staff will file all of the amendments with the California Energy Code.

Staff recommends approval of Ordinance 786 N.S. Should the Council approve a first reading of the recommended ordinance on November 17, 2025, a second reading could occur as soon as December 1, 2025. With exception of the Reach Codes (which needs California Energy Commission approval to become effective), the 2025 State Code and amendments would go into effect on January 1, 2026.

By: Kevin Jackson, Director of Planning & Building
 Paki Muthig, Chief Building Official
 Dave Brannigan, Fire Chief
 Deniz Ergun, Sustainability Program Manager

ATTACHMENTS:

	<u>Pages</u>	
1	13-21	Ordinance No. 786 N.S., Adopting the 2025 California Code of Regulations, Title 24, and Amending division 8.02 of the Piedmont City Code
	22-44	Exhibit A to Ord.786 N.S. – City Code division 8.02 – Adoption of California Building Standards Code and Amendments
2	45-74	Redline version of revised City Code division 8.02

Separate and available:

- Piedmont City Code Chapter 8, Building, Construction, and Fire Prevention, available at: https://piedmont.ca.gov/government/charter__city_code
- 2025 Codes: Cost Effectiveness Studies commissioned by the California Codes and Standards Reach Code Program and prepared by Frontier Energy, Inc Misti Bruceri & Associates, LLC, available at: <https://localenergycodes.com/content/resources>