



May 9, 2025

The Honorable Nick Schultz  
Member, California State Assembly  
1021 O Street, Suite 5150  
Sacramento, CA 95814

**RE: AB 306 (Schultz) Building regulations: state building standards.**  
**Notice of OPPOSE UNLESS AMENDED** (*As Amended on 3/12/25*)

Dear Assemblymember Schultz,

The League of California Cities (Cal Cities) **respectfully maintains an opposes unless amended position** on **AB 306 (Schultz)**, which would put a six-year moratorium on adopting state and local building standards except under specific circumstances.

Title 24 of California's Code of Regulations, or commonly referred to as the California Building Code or Building Standards, provides the state and local governments regulations that must comply when pursuing construction of a residential development, once a permit is approved. These standards are necessary to promote public health and safety in the built environment. California's Building Codes also provide mandatory regulations for various other factors in building design, such as energy efficiency, the use of new technology, and other necessary measures for safe, healthy, and structurally sound construction.

After the state adopts and approves the Building Standards, local governments must adopt them locally to enforce the regulations before construction can commence. Local governments can also adopt more stringent standards, called reach codes, at the local level for climatic, geographic, or topographic conditions only after approval from the relevant state agency overseeing those specific regulations. For example, a local government may include energy efficiency standards in a reach code that goes beyond the California Energy Code overseen by the California Energy Commission.

Cal Cities understands and supports the intent of AB 306, which is aimed at reducing the rebuilding costs associated with the recent Los Angeles wildfires. By not adopting future and new building standards over the next two cycles, the cost of rebuilding is anticipated to be less, providing affordability relief to those most impacted in the recent burn areas. However, AB 306 would prohibit the state and all local governments from adopting any new Building Standards for six years, creating significant implications and stalling local governments outside of the Los Angeles wildfire burn area that have made progress in advancing local reach codes. Cal Cities is concerned this change in state law would be regressive in nature and disincentivize cities that are continuing to adopt local reach codes for building construction and design to be climate resilient. Additionally, the current exemptions in the bill would not allow a local government to



advance locally adopted home hardening building standards that go beyond what is adopted by the Office of the State Fire Marshal at the state level.

To address our concerns with AB 306, Cal Cities offers the following amendments:

- Uphold the intent of the bill to provide a temporary moratorium in the adoption of Building Standards to offer affordability relief for Los Angeles communities impacted by this year's devastating wildfires.
- Clarify that any rebuild must comply with the building standards that were in place at the time the homes were lost and burned.
- Provide flexibility to local governments by allowing local reach codes for new construction to continue for cities that would like to progress in meeting the state's climate goals.
- Clarify that the home hardening exemption may include hardening measures local communities enact beyond those adopted by the Office of the State Fire Marshal.

For these reasons, Cal Cities **respectfully maintains an oppose unless amended position AB 306 (Schultz)**. Cal Cities appreciates the author's willingness to work with us to address these concerns to solve these important issues. If you have any questions, do not hesitate to contact me at [bguertin@calcities.org](mailto:bguertin@calcities.org) or 916-658-8255.

Sincerely,

A handwritten signature in blue ink that reads "Brady Guertin".

Brady Guertin  
Legislative Advocate