

May 21, 2025

The Honorable Nick Schultz
California State Assembly
1021 O Street, Suite 5120
Sacramento, CA 95814

**RE: AB 306 (Schultz) Building regulations: state building standards.
City of Palo Alto – Notice of Opposition, Unless Amended**

Dear Assembly Member Schultz:

On behalf of the City of Palo Alto, I write to respectfully express our Oppose Unless Amended position on Assembly Bill 306, unless amended to clearly allow local governments to (1) adopt the forthcoming 2025 edition of the California Building Standards Code and (2) continue enforcing and updating local Reach Codes that were lawfully adopted prior to January 1, 2025.

Palo Alto has long been recognized as a leader in sustainable design, energy innovation, and building decarbonization. Our local Reach Codes—developed through extensive stakeholder engagement and grounded in specific climatic and environmental findings—have played a critical role in advancing state and local climate goals, supporting our transition to electrification, and ensuring building safety and performance in our community.

While we understand and support the intent behind AB 306 to bring consistency and certainty to housing construction standards statewide, we are concerned that the bill as currently drafted would have the unintended consequence of freezing necessary local standards and innovations. Specifically:

1. The bill does not clearly affirm that jurisdictions may adopt and enforce the 2025 California Building Standards Code upon its publication, as is the current practice every three years. Cities must maintain this ability to align with the latest code cycle and avoid regulatory confusion.
2. The bill's limitations on local amendments to residential standards could prevent cities from maintaining or refining Reach Codes that were adopted before 2025—even if those codes are consistent with the California Energy Commission's guidance and approved through proper findings under existing law.
3. The narrow exceptions included in the bill—for emergencies, home hardening, and codes in effect as of January 1, 2025—do not adequately account for the evolving needs of local governments in areas such as climate resilience, electrification readiness, and energy efficiency.

To address these concerns, we respectfully request the following amendments to AB 306:

- Explicitly authorize the adoption and local implementation of the 2025 California Building Standards Code, including related model codes and locally adopted ordinances necessary to effectuate those standards.

City of Palo Alto

Office of the Mayor and City Council

- Preserve the authority of cities to continue enforcing and reasonably updating Reach Codes that were adopted prior to January 1, 2025, provided those codes comply with existing statutory requirements under Health and Safety Code Sections 17958.5 and 17958.7.
- Ensure flexibility for local governments to respond to new technologies, climate adaptation needs, and local infrastructure constraints, especially when such standards are aligned with broader state goals and adopted through transparent public processes.

Without these clarifications, AB 306 risks disrupting local decarbonization efforts, undermining tested building policies, and introducing regulatory uncertainty that may delay, rather than accelerate, housing delivery.

We thank you for your leadership on housing and welcome continued collaboration to refine AB 306 in a way that supports statewide consistency while preserving the role of local innovation in advancing shared goals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Lauing', is positioned above the printed name.

Ed Lauing
Mayor
City of Palo Alto

Cc: Assembly Member Marc Berman
Senator Josh Becker