



City of Encinitas City Council's Office

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April 16, 2025

Bruce Ehlers
Mayor

The Honorable Aisha Wahab, Chair
Senate Housing Committee
1021 O Street, Room 3330
Sacramento, CA 95814

RE: AB 306 (Schultz) Building regulations: state building standards – Notice of Opposition

Joy Lyndes
Deputy Mayor

Dear Senator Wahab,

The City of Encinitas writes to express our strong opposition to your AB 306 (Schultz). We appreciate and share the goal of bringing down the cost of housing in California. However, imposing a wide-reaching moratorium on new state and local building codes for both new and existing housing does not further this objective. Instead, by taking away a key tool for local governments to increase efficiency in residential buildings, AB 306 interferes with the ability of cities to address the affordability of energy bills and to achieve their climate commitments.

Jim O'Hara
Council Member

Maro San Antonio
Council Member

Luke Shaffer
Council Member

Encinitas would be directly affected by this bill because it would prohibit our ability to adopt local building standards (commonly called "reach codes") based on local climate, geology, or topography. The City of Encinitas has historically adopted several reach codes in order to implement the City's Climate Action Plan, including local codes in the Energy (Part 6) and Green Building (Part 11) sections of the California Building Standards Code. Recent examples include Ordinance Nos. 2024-04, 2022-14, 2022-13, and 2021-13. These ordinances enable the City to adopt energy efficiency and green building codes that prevent future emissions of greenhouse gases and align with the goals and targets in the City's Climate Action Plan. In order to remain effective, reach codes must be readopted every three years, concurrent with the local adoption of the State code into the City's municipal code. AB 306 would prohibit the City from being able to do this for the upcoming building code cycle, thereby deeming our previously adopted reach codes null and void. This would limit several of the City's most cost-effective Climate Action Plan measures and cause significant confusion with local developers as

Jennifer Campbell
City Manager

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the City would have to roll back local requirements and procedures that have already been established.

Local governments stand at the frontlines of the climate, housing and biodiversity crises. Cities and counties grapple directly with the impacts of wildfires, extreme heat, drought, sea level rise, and coastal erosion, in addition to homelessness and housing unaffordability. As local governments face critical housing availability and affordability challenges, we share the goals of increasing housing supply and lowering costs; however, local building codes are not the primary impediment to achieving these goals. Research shows that the costs of land, labor, material price hikes from the pandemic, and permitting are largely responsible for higher housing costs.¹ Local reach codes are one of our most essential tools for adopting measures that serve our unique regional climate and housing needs, including those necessary for meeting local Climate Action Plans as recommended under the Air Resources Board 2022 Scoping Plan and wildlife habitat connectivity protections to help meet the Governor’s 30 x 30 conservation goals (Executive order #N-82-20²). Eliminating local reach codes would not effectively address the intended outcomes of this bill.

Cities and counties that have ambitious, and therefore prudent, Climate Action Plans have been proving grounds for advancing building codes at the state level, including nature conservation measures. The two levels of government work hand in hand to put into place the necessary policies and regulations that drive us towards a more sustainable future. AB 306 would stall these time sensitive efforts to address the climate and biodiversity crises with the urgency that they demand and deserve.

Further, while the stated objective of AB 306 is to increase the supply of housing, it also freezes updates to building code provisions applicable to alterations of existing housing. These provisions are critical intervention points for local governments to increase efficiency in existing homes to reduce energy bills and improve climate resilience.

Moreover, far from increasing building costs, state and local reach codes that incentivize all-electric adoption and energy efficient appliances have helped reduce construction costs³ by as much as \$10,000⁴ per home and saved over \$100 billion in avoided energy costs over the last 50 years. By putting a moratorium on code updates, AB 306 blocks continued progress and the incorporation of emerging efficient technologies into new and existing buildings.

¹ [“Californians: Here's why your housing costs are so high”](#) CalMatters, 2024

² [“30 x 30 California,”](#) October 2020

³ [“FAQ - Electrification”](#) CEC, 2022

⁴ [“Residential Building Electrification in California”](#) E3, 2019

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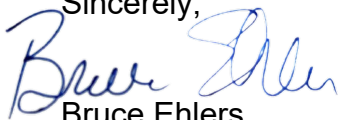
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As drafted, AB 306 would also prevent the state from adjusting code to make improvements brought to the state by both local jurisdictions and builders—including updating the ability of the Commission to accept online forms, streamline code compliance forms and systems, adapt existing code to accommodate technology advancements and to promote cost-savings for both builders and residents. Pausing new building code updates would also prevent the incorporation of pending revisions to the National Electrical Code - revisions that would help homeowners avoid unnecessary electrical panel upgrades that needlessly result in increased costs and time delays and additional strain on the electrical grid. These upgrades range in cost from \$3,000 to \$30,000 per customer and have cascading impacts on utility upsizing and ratepayer costs.

For these reasons, the City of Encinitas strongly opposes AB 306.

Sincerely,



Bruce Ehlers
Mayor
City of Encinitas

cc: The Honorable Nick Schultz
Senator Catherine Blakespear
Assemblymember Tasha Boerner