



# CITY OF DEL MAR

June 18, 2025

The Honorable Aisha Wahab  
Chair, Senate Housing Committee  
1021 O St, Suite 3330  
Sacramento, CA 95814

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

Dear Senator Wahab,

The City of Del Mar is in strong opposition to AB 306 (Schultz). As proposed, AB 306 would impose a six-year moratorium on the adoption of state and local building standards except under specific, emergency conditions.

Title 24 of the California Code of Regulations contains the California Building Standards, which establish residential building standards. The state's building standards are necessary to promote public health, structural safety, and sustainability. Title 24 has historically been updated on a triennial basis, with the next update expected to be published this year and adopted by local jurisdictions by January 1, 2026.

As identified by the author of the bill, California's building codes are among the most energy-efficient and protective of public health in the nation. However, the restrictiveness of the codes has been identified as a contributing factor to the increased cost of new housing construction and is expected to burden the victims of the recent wildfires across Los Angeles County. While the City of Del Mar supports efforts to assist the communities affected by the fires, AB 306 would limit a jurisdiction's ability to require new residential buildings to comply with the most current standards for safety. This could impede the production of new residential development, even beyond the moratorium period.

Based on the proposed bill text, the moratorium would prevent local jurisdictions from adopting the pending updates included in the 2025 Intervening Code Adoption Cycle of the California Building Standards. Amongst a variety of changes, the pending update is expected to include revised standards that would improve the resilience of new residential buildings during a wildfire event. Considering the Los Angeles County fires as well as the heightened awareness of wildfire risks across the state, the City of Del Mar is focused on implementing standards that would reduce the likelihood and severity of wildfire events to the maximum extent practicable.

If the 2025 updates to the California Building Standards related to fire are adopted under the allowed exceptions to the bill, standards intended to increase public health, structural

safety, and sustainability will still be withheld from adoption under the bill's proposed moratorium. It is in the best interest of the public that new residential buildings comply with the most current standards as the longevity of these structures will long surpass the moratorium period.

Based on comments provided by the Assembly Committee on Appropriations, it is anticipated that local agencies, builders, design professionals, and the public will be reliant on the California Building Standards Commission (CBSC) and the State's Department of Housing and Community Development (HCD) to provide technical assistance during the moratorium period. When the moratorium is lifted in 2031, it is also anticipated that there will be a significant surge in workload for these agencies as staff try to process jurisdictions' local ordinance applications. Both CBSC and HCD have identified that there are no existing resources to meet the current or future demand that will be required to address the statutes of this bill.

The strain experienced by CBSC and HCD will be passed along in the form of delays for local jurisdictions attempting to process residential building permit applications. While there may be an upfront cost savings for those impacted by the Los Angeles County fires, the delays anticipated as a result of this bill will likely be more costly statewide. Longer, costlier application processes are a significant impediment to housing production.

The City of Del Mar urges the State Senate to consider the long-term, statewide impacts of the proposed statutes of AB 306. The moratorium will prevent the implementation of residential building standards developed to further public health and safety while creating a backlog that will disincentivize new housing production beyond the proposed moratorium period. For these reasons, the City of Del Mar strongly opposes AB 306.

Sincerely,

A handwritten signature in black ink that reads "Terry Gaasterland". The signature is written in a cursive, flowing style.

Terry Gaasterland  
Mayor

- cc. Assemblymember Tasha Boerner  
Senator Catherine Blakespear  
Catherine Hill, Regional Public Affairs Manager, [chill@calcities.org](mailto:chill@calcities.org)  
League of California Cities, [cityletters@calcities.org](mailto:cityletters@calcities.org)  
Del Mar City Council  
Ashley Jones, City Manager, City of Del Mar