



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT

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June 24, 2025

The Honorable Aisha Wahab
Chair, Senate Committee on Housing
1021 O Street, Room 3330
Sacramento, CA 95814
SHou.Committee@senate.ca.gov

The Honorable Maria Elena Durazo
Chair, Senate Committee on Local Government
State Capitol, Room 407
Sacramento, CA 95814
slcl.committee@senate.ca.gov

**RE: Opposition to AB 306 (Schultz) – Impacts to Local Climate Action and Building Code Authority
(as amended June 10)**

Dear Chair Wahab and Chair Durazo,

On behalf of Humboldt County, I am writing in opposition to Assembly Bill 306, unless amended. While we recognize the urgent need to increase housing production across California, this bill, as drafted, poses a serious threat to local governments' ability to implement climate action strategies and build future-ready, resilient communities.

Frankly, we see no benefit to this bill as it is currently written. California does need to mandate more housing, but this must be done in a way that supports—not hinders—greenhouse gas (GHG) reduction and climate resilience. AB 306 does not help in that effort. It freezes the California Building Standards Code as of January 1, 2025, blocking local jurisdictions from adopting new or updated standards related to sustainability and resilience. This freeze would likely extend through the next three building code cycles, even as the effects of climate change worsen.

A new state building code is due in 2026 and is expected to include stronger requirements for climate adaptation. Under AB 306, jurisdictions like ours would be precluded from advancing beyond the 2025 baseline—effectively locking in outdated standards and undermining local responses to climate threats such as wildfire, sea-level rise, and extreme weather.

Humboldt County is currently developing ordinances required under our Regional Climate Action Plan (RCAP). While these may not fall under the formal scope of the Building Code, they apply to new development. We fully expect that developers will argue that AB 306 prohibits implementation of

such local measures—delaying or invalidating critical tools needed to meet our emissions reduction and climate adaptation goals.

Our concerns are as follows:

- Freezing the code limits progress: Preventing any code advancements until 2031, regardless of local climate needs, undercuts our ability to act on current science and risks locking in costlier long-term consequences for communities and ratepayers.
- Interference with non-code RCAP policies: Even ordinances not explicitly part of the Building Code but tied to new construction—such as electrification readiness or energy efficiency—could be vulnerable under this bill.
- Conflict with state mandates: AB 306 undermines implementation of SB 32, AB 32, and SB 375, which all depend on strong local climate leadership.

We urge that AB 306 be amended to:

1. Exclude existing buildings from its scope, allowing for modernized retrofits and appliance standards.
2. Clarify that local authority remains intact through at least March 31, 2026, to allow the timely adoption of the 2025 code and reasonable modifications.
3. Protect local disaster resilience standards beyond what is already provided in this bill, including those addressing wildfires, sea-level rise, and extreme heat.
4. Permit substitute standards for repealed all-electric ordinances to maintain decarbonization progress.
5. Allow local code updates that lower construction costs or streamline project delivery, consistent with housing production goals.

Absent these amendments, AB 306 jeopardizes both the climate commitments and planning autonomy of Humboldt County and other jurisdictions working in good faith to support housing production while safeguarding public health, safety, and the environment.

Thank you for your consideration.

Sincerely,

Michelle Bushnell, Chair
County of Humboldt, Board of Supervisors

CC:

- State Senate Committee on Housing
- State Senate Committee on Local Govt.
- Assemblymember Nick Schultz (author)
- Assembly Speaker Rick Rivas (author)
- Senate Pro Tem Mike McGuire
- Senator Mike McGuire, Senate President pro Tempore
- Assemblymember Chris Rogers
- California State Association of Counties (CSAC)
- Rural County Representatives of California (RCRC)