



June 12, 2026

The Honorable Jesse Arreguín
Chair, Committee on Housing
California State Capitol
Sacramento, CA 95814

Re: Support with Changes for AB 306 (Shultz, Hadwick, Wicks)

Dear Chair Arreguín:

On behalf of the Council of Infill Builders, a statewide organization of real estate professionals committed to improving California through infill development, I write to express our support with changes for Assembly Bill 306, which addresses a longstanding challenge within California's building code framework: the lack of a practical and effective statewide appeals process to resolve code-related issues of broad significance.

California's 540 local jurisdictions independently interpret and amend state building standards, often resulting in inconsistent application of the code, avoidable delays, and increased project costs. In practice, a design solution approved in one jurisdiction may be rejected in another, creating uncertainty for project teams, discouraging innovation, and making it more difficult to deliver housing and other critical projects efficiently across the state.

AB 306 establishes a more workable process for resolving building code issues that have statewide implications while preserving local authority over matters that are appropriately addressed at the local level. Specifically, the bill:

- Allows appeals on matters of statewide significance without requiring exhaustion of local appeals first;
- Allows appeals of code interpretations and local code amendments;
- Provides for state-level code equivalency determinations;
- Preserves local appeals for issues that do not rise to the level of statewide significance;
- Utilizes existing Office of Administrative Hearings procedures where appropriate; and
- Promotes a more transparent, efficient, and consistent process for resolving issues affecting project delivery throughout California.

These reforms would help reduce unnecessary barriers to housing and economic development, improve consistency in code application, encourage innovation, and support more predictable project delivery statewide.

The members of our organization are real estate practitioners who struggle with inconsistent code interpretations, local amendments, and the absence of a practical statewide appeals process. However, we recommend three key changes to the bill as written:

- First, the standard of review for appeals should be based on performance rather than prescription.

- Second, the appeals decisions should be biased toward innovation and solutions that promote adaptive, reuse and housing construction as long as they are not shown to be hazardous.
- Finally, existing precedents in cities that have taken more innovative approaches to interpreting the code should be taken as strong evidence the appeal should be granted.

With those changes, we believe AB 306 would strike an appropriate balance by maintaining local control while creating a fair, efficient, and transparent mechanism for addressing issues that extend beyond a single jurisdiction.

For these reasons, the Council of Infill Builders respectfully urges your support of AB 306 with those changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mott Smith', with a long horizontal flourish extending to the right.

Mott Smith
Director
Council of Infill Builders