

Date of Hearing: March 12, 2025

ASSEMBLY COMMITTEE ON HOUSING AND COMMUNITY DEVELOPMENT

Matt Haney, Chair

AB 306 (Schultz) – As Amended March 5, 2025

SUBJECT: Building regulations: state building standards

SUMMARY: Imposes a moratorium on the adoption or modification of new state and local building standards affecting residential units from June 1, 2025 until June 1, 2031, with limited exceptions. Specifically, **this bill:**

- 1) Prohibits the California Building Standards Commission (CBSC) and any other adopting agency, from June 1, 2025, until June 1, 2031, from considering, approving, or adopting any proposed building standards affecting residential units unless either of the following conditions is met:
 - a) The CBSC deems those changes necessary as emergency standards to protect health and safety; or
 - b) The building standards are related to home hardening and are proposed for adoption by the Office of the State Fire Marshal (SFM).
- 2) Prohibits a city or county from making changes or modifications to building standards affecting residential units, including to green building standards, from June 1, 2025 until June 1, 2031, unless one of the following conditions is met:
 - a) The changes or modifications are substantially equivalent to changes or modifications that were previously filed by the governing body of the city or county and were in effect as of January 1, 2025;
 - b) The CBSC deems those changes or modifications necessary as emergency standards to protect health and safety;
 - c) The changes or modifications relate to home hardening; or
 - d) The building standards relate to home hardening and are proposed for adoption by a fire protection district pursuant to existing provisions governing the proposal of new standards by fire protection districts.
- 3) Requires CBSC to reject a modification or change to any building standard affecting a residential unit filed by the governing body of a city or county, from June 1, 2025 until June 1, 2031, unless one of the conditions in 2) above is met.
- 4) Includes an urgency clause.

EXISTING LAW:

- 1) Establishes the CBSC within the Government Operations Agency and requires CBSC to receive proposed building standards from state agencies for consideration in an 18-month code adoption cycle, with procedures that ensure adequate public participation, notice and

justification, technical review, and opportunities for advisory input before adoption by CBSC. (Health and Safety Code (HSC) Section 18920 and 18921.1)

- 2) Requires any building standard adopted or proposed by state agencies to be submitted to, and approved or adopted by, the CBSC prior to codification. Requires building standards submitted for approval to include an analysis written by the agency proposing the standards which justifies the approval using the following criteria:
 - a) The proposed building standard does not conflict with, overlap, or duplicate other building standards;
 - b) The proposed standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency;
 - c) The public interest requires the adoption of the building standard, which includes, but is not limited to, health and safety, resource efficiency, fire safety, seismic safety, building and building system performance, and consistency with environmental, public health, and accessibility statutes and regulations;
 - d) The proposed standard is not unreasonable, arbitrary, unfair, or capricious;
 - e) The cost to the public is reasonable, based on the overall benefit to be derived;
 - f) The proposed standard is not unnecessarily ambiguous or vague;
 - g) The applicable national specifications, published standards, and model codes have been incorporated where appropriate;
 - h) The format of the proposed standard is consistent with that adopted by the CBSC; and
 - i) The proposed standard, if it promotes fire and panic safety, as determined by the SFM, has the written approval of the SFM. (HSC 18930(a))
- 3) Requires every agency subject to the Administrative Procedure Act (APA) to prepare and submit an initial statement of reasons for proposing the adoption, amendment, or repeal of a regulation, which must include certain information, including for building standards, the estimated cost of compliance, the estimated potential benefits, and the related assumptions used to determine the estimates. (Government Code Section 11346.2(b)(5)(B)(i))
- 4) Allows any city or county to make changes or modifications to building standards that regulate structures used for human habitation and published in the California Building Standards Code (state building code) upon express findings, as specified. If any city or county does not amend, add, or repeal ordinances or regulations to impose those requirements or make changes or modifications in those requirements upon express findings, the provisions published in the state building code and other regulations apply to the city or county and take effect 180 days after publication by the CBSC. (HSC 17958)
- 5) Allows a city or county, in adopting ordinances or regulations under 4) above, to make changes or modifications in the requirements of the state building code and other regulations, including green building standards, as it determines are reasonably necessary because of local climatic, geological, or topographical conditions. (HSC 17958.5)

- 6) Requires the governing body of a city or county, before making any modifications or changes under 5) above, to make an express finding that such modifications or changes are reasonably necessary because of local climatic, geological or topographical conditions, and requires those findings as well as the modification or change expressly marked and identified to be filed with the CBSC. Prohibits a modification or change from becoming effective or operative until the finding and modification or change have been filed with CBSC. (HSC 17958.7(a))
- 7) Allows CBSC to reject a modification or change filed by the governing body of a city or county if no finding was submitted under 6) above. (HSC 17958.7(b))
- 8) Requires CBSC to act upon emergency standards within 30 days and only when the adopting agency or state agency that proposes the building standards has made the finding of emergency required under the APA, as specified, and the adopting agencies have adopted the emergency standard in compliance with the APA, and the CBSC concurs with that finding of emergency. Requires the concurrence and the approval of the emergency building standards to be made with an affirmative vote of two-thirds of the members of the CBSC attending a meeting, or not less than six affirmative votes, whichever is greater. (HSC 18937)

FISCAL EFFECT: Unknown.

COMMENTS:

Author's Statement: According to the author, "California has a multi-million unit housing deficit. This mismatch of supply and demand has resulted in our longstanding housing crisis. Our home prices are double the national average, a majority of renters sacrifice basic needs like food and health care to pay for housing, and we have an astonishing level of homelessness, exceeding 180,000 unhoused Californians. The recent fires in Los Angeles have only exacerbated these housing issues.

California's building codes are some of the most energy-efficient and protective of health and life safety in the nation, but the cumulative impact of ever more aggressive building code updates has measurably increased the cost of new housing construction. Industry stakeholders estimate the upfront cost increases of the code changes made over the last 15 years to be in the \$50,000-\$100,000 range per single-family unit, not including further cost pressures from local modifications.

AB 306 would pause additional changes to state building standards affecting residential construction for six years, excluding emergency changes necessary for protecting health and safety and home hardening. This bill would also prohibit local governments from making new modifications to residential building standards for six years, with limited exceptions.

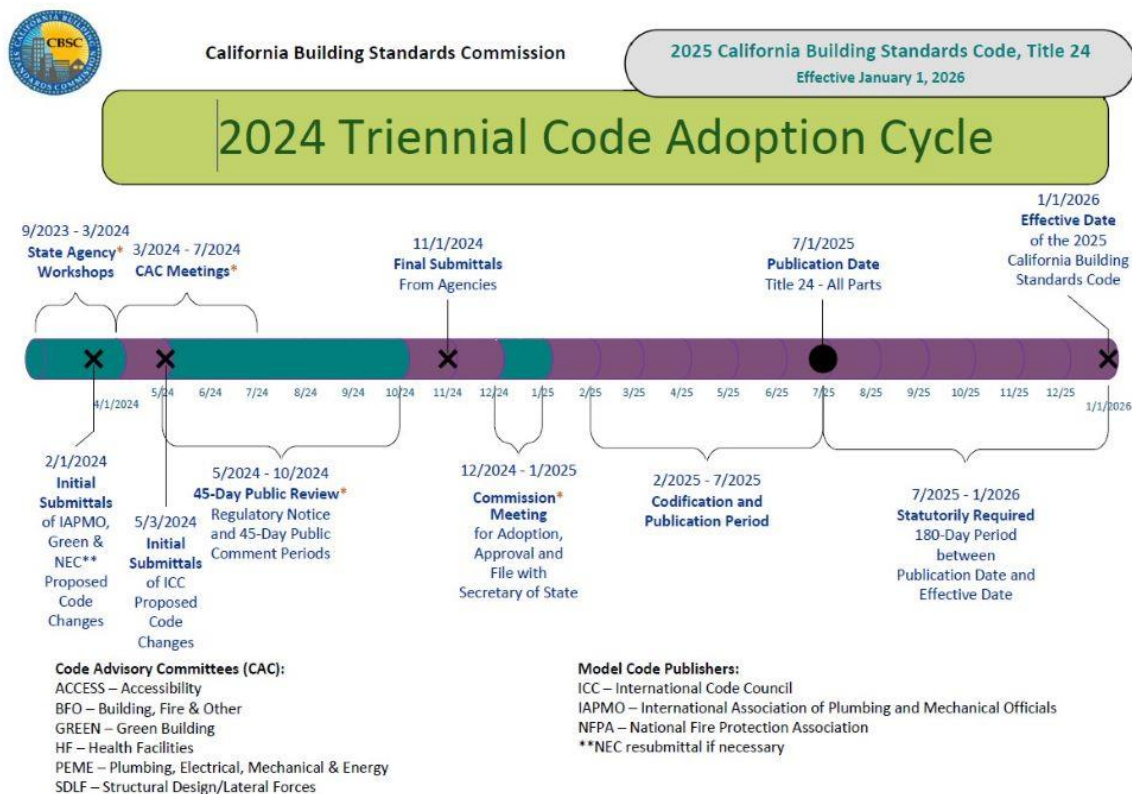
This moratorium will bring more certainty to the home construction industry and help stem further construction cost increases, given the demand surge from the volume of homes and apartments that will need to be rebuilt in Los Angeles. Freezing the codes affecting residential construction will prevent further cost increases for new homes and apartments. Pausing further changes will also allow the current contractor workforce and local building officials to absorb the newest code requirements and have certainty that they will remain in place for six years such that

they will not have to take time to relearn and reconfigure certain practices every 18-to-36 months.

Given it is likely to take affected individuals several years to remediate sites, receive insurance payouts or financial assistance and line up financing, locate contractors and supplies, and pull permits to begin reconstruction, further increases and changes to building standards requirements will only make the rebuilding process more difficult and costly for residents.”

Background on Building Standards: The California Building Standards Law establishes the process for adopting state building standards by the CBSC. Statewide building standards are intended to provide uniformity in building across the state. The Commission’s duties include the following: receiving proposed building standards from state agencies for consideration in each triennial and intervening building code adoption cycle; reviewing and approving building standards submitted by state agencies; adopting building standards for state buildings where no other state agency is authorized by law; and publishing the approved building standards in the California Building Standards Code (California Code of Regulations, Title 24).

Most building standards currently in use in California are developed and vetted at the national level every three years by technical organizations, academics, and trade associations that develop national consensus standards, which are then incorporated into the International Building Code (IBC), the national model code used by most US jurisdictions. At the state level, state agencies with authority over specified occupancies then review the IBC and amend as necessary for California’s specific needs. There are approximately 20 state agencies that develop building standards and propose them for adoption to the CBSC.



After the proposal of building standards by state agencies, the standards undergo a public vetting process. A code advisory committee composed of experts in a particular scope of code reviews the proposed standards, followed by public review. The proposing agency considers feedback and may then amend the standards and re-submit them to the CBSC for consideration. CBSC reviews and adopts the standards and files them with the Secretary of State for codification and publishing, and there is a 180-day period during which local agencies file modifications and changes to the state codes (though they are not limited to this window). The new codes then take effect January 1 of the subsequent year following publication.

Updates and changes to building standards are adopted on two timelines: through the triennial code adoption cycle which occurs every three years, and through the intervening code adoption cycle which provides an update to codes 18 months after the publication of the triennial codes. Regulatory activities for each cycle begin over two years before the effective date of the codes.

Local Amendments to State Codes: Local governments are provided wide latitude to make changes and modifications to the state baseline codes – so long as they exceed or are more protective than the state baseline, not a reduction – and for codes affecting residential buildings (excluding energy “reach codes” which follow a different process), neither the CBSC nor statute requires the local modifications to include any cost determinations or economic impact analysis. Local governments simply have to include a finding in their filing with the CBSC that the modifications are “reasonably necessary because of local climatic, geological, or topographical conditions” (HSC 17958.7) or environmental conditions for green building standards. CBSC does not currently have the authority to review these findings for validity, merits, or the justification of reasonableness, nor do the local amendments have to follow the APA or more rigorous state review criteria requiring state building standards to “not [be] unreasonable, arbitrary, unfair, or capricious, in whole or in part” (HSC 18930(a)(4)) or have a “cost to the public [that is] reasonable, based on the overall benefit to be derived from the building standards” (HSC 18930(a)(5)).

Los Angeles Wildfires and Rebuilding Challenges: The fires in Southern California that began on January 7th displaced tens of thousands of Los Angeles County residents. Once the fires were extinguished, more than 13,000 homes and apartments had been destroyed. Disasters compound existing housing market challenges and the Los Angeles region had been in a severe housing affordability crisis well before the sudden destruction of 13,000 housing units. Constrained housing supply has led to increased housing cost burdens, especially among populations vulnerable to disaster. A myriad of recovery assistance programs, timelines, and restrictions have brought further instability to fire survivors’ efforts to locate new housing while deciding if and how they will rebuild their destroyed homes.

In response to the wildfires, Governor Newsom issued Executive Order N-4-25 on January 12, 2025 which included the following provisions related to building standards: “5. HCD, in consultation with DGS, the Office of the State Fire Marshal, and the California Energy Commission, shall, within 60 days, review and provide a report to me with recommendations regarding any provision of the Building Standards Code, Title 24 of the California Code of Regulations, that should be suspended for [rebuilding projects] in order to facilitate rapid, safe, and cost-effective rebuilding and recovery.” No information is available yet regarding whether the Governor will move to suspend any specific provisions of building codes for such projects.

Many of the homes that burned in the fires were built decades ago, even before the state had adopted certain building standards which are now extremely robust, like the Energy Code which was first adopted in the late 1970s. In addition, not all affected properties were insured, or had minimal insurance that likely lacked building code upgrade/replacement coverage. Thus, some owners will not be able to draw on insurance payouts to assist with rebuilding older homes and apartments that were destroyed up to current code, as is generally required when rebuilding. Those who did opt for building code upgrade coverage may only have had a minimal amount. Since these older homes and apartments were built, there have been many additions to state and local code requirements that owners will have to incorporate into their rebuilding plans in order to be issued building permits, including requirements to install fire sprinklers in all new dwellings, solar panels and battery storage in certain types of residential construction, larger electrical panel capacity and more 240V outlets for electric vehicles and appliances, and more.

It is likely to take fire victims who wish to rebuild several years to remediate sites, receive insurance payouts or FEMA financial assistance and line up financing, locate contractors and supplies, and pull permits to begin reconstruction. Given this lengthy rebuilding timeline and the frequency of code changes every 18 months, building codes will continue to be modified during the rebuilding period. While not all code modifications are significant, further changes to these requirements may present challenges to fire victims as building codes only “lock in” when a person receives a building permit from a local government.

Key Provisions of This Bill: This bill would impose a six-year moratorium on the proposal or adoption of new state building standards and modifications to building standards affecting residential units (new and existing) from June 1, 2025 until June 1, 2031. Two exceptions to the state moratorium are provided – first, if the standards are proposed via the existing emergency standards process outlined in HSC 18937 and the CBSC agrees with the proposing agency that the standards meet the criteria for emergency adoption. And second, if the standards are proposed by the SFM and relate to home hardening. The moratorium would only apply to standards affecting residential units, meaning standards for nonresidential buildings would remain unaffected.

This bill would also impose a six-year moratorium on the adoption of new local amendments and modifications to building standards affecting residential units (new and existing) from June 1, 2025 until June 1, 2031. Local agencies would be permitted to re-file amendments or modifications that are substantially equivalent to those that they already had in effect as of January 1, 2025 – in effect a “hold harmless” to allow the reauthorization of any local standards that are already in place – but new amendments impacting residential units would not be permitted unless they meet limited exceptions. Those exceptions are similar to the state exceptions, including for emergency reasons, for home hardening, or those proposed by a fire protection district that relate to home hardening under specified law allowing for fire protection districts to make such changes.

Individuals may still choose to exceed the state baseline codes, as they always have the option to do. In addition, code proposals impacting new and existing non-residential buildings would still be permitted to continue as expected. All the items contained in the most recent triennial code that will take effect January 1, 2026 will continue to go into effect as planned, as those codes have already been adopted by the CBSC at their recent meetings on February 26-28, 2025 and December 17-19, 2024. Code agencies will still have the option to bring new proposals to the CBSC to address pressing health and safety issues through the emergency standards process if

there is sufficient justification for the urgency of those standards. And agencies and stakeholders may continue to work on other non-emergency proposals and could have them ready to propose immediately upon expiration of the moratorium.

Frequency of Code Changes: As previously mentioned, building codes are updated every 18 to 36 months. This frequency of changes means that when code agencies are publishing final versions of triennial codes, they are already beginning to coordinate the review and analysis of new proposed changes for the next intervening code cycle before the ink is barely dry on those “new” codes. For example, although CBSC just adopted many chapters of new codes for the current triennial cycle in December and February, which will not take effect until January 1, 2026, they are simultaneously already preparing the next intervening code cycle with workshops for March 20, 2025: “During the pre-cycle period of an Intervening Code Adoption Cycle, proposing state agencies hold public workshops to discuss possible supplemental amendments to the 2025 Code. Workshops provide an open forum for the public and industry stakeholders to participate in vetting potential modifications to California's building codes. Approved code changes will result in supplements (blue pages) to the 2025 edition of Title 24, and will become effective July 1, 2027.”

This rush to begin formulating amendments to codes that have not yet actually taken effect raises a number of concerns. Triennial and intervening code cycles effectively “back up” into each other, given the intensive calendar of code advisory committee reviews, public comment periods, and staff resources that must be allocated to develop and vet new changes and comply with regulatory timelines. The speediness of new changes also raises questions regarding the cost of compliance analyses that are intended to be performed for new standards, given there may not have been sufficient time for development projects to have actually completed construction under the new standards (many projects take longer than 18 months to complete) and have quality data that agency staff can utilize when performing these cost analyses. Some agencies, like the Energy Commission, must perform more granular cost-effectiveness analyses of new standards, although these are amortized over an anticipated 30-year timeframe and involve complex energy and construction cost modeling.

Furthermore, once codes are in effect, a large array of individuals have to be trained up to the new requirements – including local building officials who are charged with implementing and enforcing the codes, planners and architects who design projects, contractors and subcontractors who are managing projects, various tradespeople responsible for the specific construction work, and building inspectors who have to sign off on the work being completed up to the relevant codes in effect at the time building permits were pulled. Temporarily pausing further changes will allow the current workforce and local building officials to learn the newest code requirements and have certainty that they will remain in place for six years such that they will not have to take time to re-learn and reconfigure certain practices every 18-to-36 months.

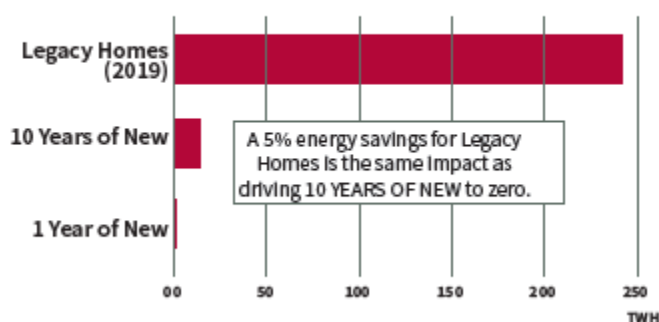
In addition, given the lengthy timeline for some development projects to get approvals and for affordable housing in particular to line up many financing sources, and in single-family projects with phased sequencing of tracts of a subdivision, projects sometimes have to be redesigned once or multiple times to keep up with new codes. For developers, time is money and delays and redesigns contribute to increased overall project costs. A temporary moratorium would provide certainty to both affordable and market-rate developers facing longer project timelines that significant redesigns or modifications will not be necessary to comply with new requirements.

Numerous Additional Directives and Mandates in Recent Years: The Legislature has passed and the Governor has signed multiple additional directives to research and propose new building standards in recent years around proposals like rainwater catchment, electric vehicle charging, water efficiency and reuse, adaptive reuse projects, “single stair” apartments exceeding three stories, and beyond. Some of the most impactful mandates in recent years have also come from outside stakeholders or the adopting agencies themselves (rather than the Legislature), like solar panel mandates and fire sprinkler requirements. There are a number of legitimate and important concerns that are addressed by these and many other elements of building standards for housing. However, the framework for proposing and adopting new standards leaves agencies in silos with regard to the volume or costs of new proposals that counterpart agencies are also simultaneously developing. Cost analyses are performed on each individual modification or for each respective chapter, not on the accumulation of the entirety of changes in each intervening or triennial cycle across all agencies. Holistic review is therefore difficult and while individual standards may increase costs by what appears a reasonable amount, from a different lens, the cost of the totality of all cumulative changes may be less reasonable. In addition, cost impacts to affordable housing developments are less visible in these analyses as these increased costs are indirectly borne by the state via higher per-unit development costs in the state’s grant, tax credit, and loan financing programs rather than extrapolated as a direct impact to the state budget in the evaluation process.

Limited GHG Benefits from Continued Increases in New Housing Standards: The state has made significant strides over the last decade to increase stringency in energy efficiency for new residential construction. To that end, under the bill, the increased performance standards, electric-ready requirements and retrofit mandates contained in the most recent 2025 Energy Code update will still take effect and the proposed moratorium would become active after. Stanford University’s *Pathways to Carbon Neutrality in California (2022)* report on existing buildings points to the diminishing returns of continuing to increase energy efficiency requirements for new residential buildings due to a number of factors, including:

- The slow pace of residential construction, which has rarely exceeded 100,000 completed units per year since 2018, according to HCD’s Annual Progress Report Data Dashboard.
- The number of existing housing units, which 2022 Census data identifies as roughly 14.6 million, many of which were constructed before the Energy Code existed, let alone the robust energy efficiency requirements elevated in more recent code cycles. Given the longevity of building use, most of these existing homes will still be in use for decades.
- The volume of energy consumption from existing homes as compared to new homes (see table). New homes consume a small fraction of the amount of the energy consumed in existing homes, such that a 5% energy savings achieved in existing homes would amount to the same as 10 years’ worth of new net-zero residential construction.

FIGURE 1: ANNUAL RESIDENTIAL ENERGY USE



*Pathways to Carbon Neutrality in California (2022),
Stanford University*

Challenges with Mandating Retrofits and Alterations to Existing Housing: Despite the high emission reduction impact possible with a focus on existing homes, there are significant challenges with how to achieve these retrofits and upgrades – for example, availability of labor familiar with newer technologies, upfront costs that lower income residents may not be able to bear while waiting for rebates or incentives, high electricity rates, and more. In addition, while homeowners face one set of costs and incentives when making decisions about when and how to upgrade and retrofit their homes, property owners with tenants in rental units may face an entirely different set of costs/incentives and tenants may be negatively impacted.

Strategic Actions for a Just Economy’s (SAJE’s) *Decarbonizing California Equitably: A Guide to Tenant Protections in Building Upgrades/Retrofits Throughout the State* (2023) identifies a number of these challenges if energy efficiency retrofit policies for existing residential units are not carefully crafted with possible repercussions to tenants – especially low-income tenants – in mind. While tenants may benefit from energy savings on utility bills, property owners are likely to pass on costs of retrofit/upgrade work to tenants in the form of increased rents. Disruptions from construction work may negatively impact habitability in the tenant’s home or may necessitate they relocate for days or weeks (possibly at their own expense), and tenants who lack robust eviction protections may face “renoviction” if a property owner seeks to remove a tenant entirely to perform the work in question.

Given the long-term ripple effects of the displacement wrought by the fires (and risk of more displacement from future disasters) pushing thousands more people into the Los Angeles region’s extremely tight housing market, imposing additional retrofit requirements – of any kind, not just with regard to energy codes – on the existing residential stock may inadvertently cause further displacement of tenants and increased rents.

Arguments in Support: According to the California Housing Consortium, “The affordable housing industry is under immense financial stress for various reasons, including the high cost of building housing in California. Excessive state and local regulatory requirements drive up the cost of building affordable housing in our state, including building code requirements that go above and beyond what is needed to protect the health and safety of California residents. These requirements are often imposed without a holistic review that analyzes the aggregate impacts of various state and local regulatory requirements and how these add to the cost of producing affordable housing. By pausing additional changes to state and local building standards for residential construction, AB 306 would provide affordable housing developers with relief from unexpected increases in project costs associated with changes to building code requirements.”

Arguments in Opposition: According to a coalition of environmental and energy groups, including the Climate Action Campaign, Natural Resources Defense Council, and US Green Building Council – Los Angeles, “While the bill allows exceptions for ‘health and safety standards’ and ‘fire hardening’ [...] AB 306 omits consideration of green building standards as a basis for acceptable code updates. This omission implies that the authors believe sustainability measures impose an unjustifiable cost on homeowners and developers. Is this the authors’ intention? Some of our issues of concern include protecting new reach codes, EV charging requirements, energy efficiency upgrades, elimination of NOx-emitting appliances, and achievement of greenhouse gas reduction goals—all of which are being addressed by forward-thinking building codes in development around California. We hope that halting this progress towards a cleaner, healthier future is not the author’s intent.”

Related Legislation:

AB 6 (Ward) of the current legislative session would require HCD to convene a working group regarding allowing residential developments between 3 and 10 units to be designed and built under the requirements of the California Residential Code rather than the California Building Code, and would require HCD to research construction cost pressures for residential construction as a result of building standards and provide a report to the Legislature on its findings.

SB 597 (Glazer, Chapter 861, Statutes of 2024): Required HCD to research and develop recommendations regarding building standards for installation of rainwater catchment systems for nonpotable uses in newly constructed residential dwellings, and requires a report to specified committees of the Legislature by January 1, 2027.

AB 529 (Gabriel, Chapter 743, Statutes of 2023): Required HCD to convene a working group regarding adaptive reuse residential projects, including identifying and recommending amendments to state building standards.

SB 745 (Cortese, Chapter 884, Statutes of 2023): Required HCD and CBSC to research, develop, and propose building standards to reduce potable water use in new residential and nonresidential buildings, and requires CBSC to perform a review of water efficiency and water reuse standards each triennial cycle and update these standards as needed.

AB 835 (Lee, Chapter 345, Statutes of 2023): Required the SFM to research standards for single-exit, single-stairway apartment houses in buildings above three stories and provide a report to specified legislative committees and to CBSC by January 1, 2026.

AB 1738 (Boerner, Chapter 687, Statutes of 2022): Required HCD and CBSC to research and develop mandatory building standards for the installation of EV chargers and not simply a requirement for “EV capable” spaces in existing multifamily and nonresidential buildings during retrofits, additions, and alterations, and mandates future updates to these standards at each triennial code adoption cycle until 2033.

REGISTERED SUPPORT / OPPOSITION:

Support

American Planning Association, California Chapter
California Apartment Association
California Building Industry Association
California Housing Consortium
California Housing Partnership Corporation
Valley Industry and Commerce Association

Support If Amended

California Association of Realtors

Opposition

350 Bay Area Action
350 Conejo / San Fernando Valley

350 Humboldt
350 Marin
350 Sacramento
350 Southland Legislative Alliance
Acterra: Action for A Healthy Planet
Active San Gabriel Valley
Ban Sup (single Use Plastic)
California building Officials
California Solar & Storage Association
California State Association of Electrical Workers
California State Pipe Trades Council
Carbon Free Palo Alto
Carbon Free Silicon Valley
Climate Action California
Climate Action Campaign
Climate Action Petaluma
Climate Reality Contra Costa County Policy Action Squad
Climate Reality Project San Diego
Climate Reality Project, California Coalition
Climate Reality Project, Los Angeles Chapter
Climate Reality Project, Orange County
Climate Reality Project, San Fernando Valley
Cool Petaluma
Design Avenues LLC
Elders Climate Action, NorCal and SoCal Chapters
Glendale Environmental Coalition
Greenbank Associates
Habitable Designs
Home Energy Analytics, INC.
Leading Change Consulting and Coaching
Marin Conservation League
Marin/Sonoma Building Electrification Squad
Mothers Out Front California
Mothers Out Front Silicon Valley
Natural Resources Defense Council
Negawatt Consulting
Peninsula Interfaith Climate Action
Project Green Home
Public Citizen
Resilient Palisades
San Diego Building Electrification Coalition
San Francisco Baykeeper
Sandiego350
Santa Cruz Climate Action Network
SoCal 350 Climate Action
Sonoma County Climate Activist Network
Sustainable San Mateo County
Third ACT SoCal
Transformative Wealth Management LLC

Trinity Respecting Earth and Environment (TREE)
U.S. Green Building Council - Los Angeles
Vector Green Power, LLC
Western States Council Sheet Metal, Air, Rail and Transportation

Oppose Unless Amended

Menlo Spark
San Francisco Bay Physicians for Social Responsibility
Silicon Valley Youth Climate Action

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