

CALIFORNIA

FIRE PREVENTION OFFICERS

March 20, 2025

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The Honorable Mike McGuire
California State Senate
1021 O Street, Suite 8518
Sacramento, California 95814

The Honorable Robert Rivas
California State Assembly
1021 O Street, Suite 8330
Sacramento, California 95814

RE: Opposition to AB 306

Dear Pro Tem McGuire and Speaker Rivas:

As an organization committed to fostering safe, sustainable, resilient, and affordable homes, as well as enhancing fire safety, we strongly oppose AB 306.

The current draft of AB 306 would impose a nearly decade-long freeze on updates to California's residential construction standards, potentially stalling critical code developments addressing earthquake risks, flooding, energy storage, energy, structure fires and wildfire safety.¹

Model building codes are updated every three years to reflect technological advancements, improvements in building science, and best practices while incorporating lessons learned from past disasters. According to the National Institute of Building Sciences (NIBS), for every \$1 invested in California's building codes, there are mitigation savings of up to \$32 against seismic risks, \$8 for wildfire mitigation, and \$6 for flood mitigation.² These benefits translate into fewer casualties, reduced property damage, minimized business interruptions, and lower costs for first responders and homeowners, benefiting all stakeholders— from government agencies and developers to insurance underwriters, lenders and sustainable communities. FEMA estimates that California's codes prevent approximately \$470 million annually in losses from earthquakes, structure fires, wildfires, and flood risks.³

Additionally, FEMA recognizes community flood hazard mitigation efforts—including regular updates to construction codes—through reductions in National Flood Insurance Program premiums. The adoption of current building and fire codes also influence eligibility for FEMA grant funding.⁴ A moratorium on the adoption of modern codes would adversely affect fire department Insurance Services Office (ISO) Public Protection Classification (PPC) ratings, which are vital for homeowner's insurance underwriting.⁵ ISO points are awarded for being on the current code cycle and could be the difference between a Class 2 or Class 3 department rating. AB 306's prohibition on state and local code updates would lead to the forfeiture of existing insurance premium reductions for many communities, including Los Angeles County, where some might face premium increases of up to 30%.⁶

¹ As it relates to building hazard resilience, the state may only consider proposals concerning wildfire home hardening that are proposed by the State Fire Marshal's Office or changes deemed "emergency standards."

² NIBS, *National Hazards Mitigation Saves* (2019).

³ FEMA, *Building Codes Save: A Nationwide Study* (2020); *Building Codes Save: Fire Hazards Pilot Study* (2024).

⁴ See [FEMA Grants](https://www.fema.gov/grants) | [FEMA.gov](https://www.fema.gov)

⁵ See [ISO's Public Protection Classification \(PPC\) Program](https://www.iso.org/publication/P08545.html) | [Verisk's Community Hazard Mitigation Services](https://www.verisk.com/communities/hazard-mitigation-services)

⁶ See <https://www.fema.gov/floodplain-management/community-rating-system>; <https://nfipservices.floodsmart.gov/reports-flood-insurance-data>; <https://www.fema.gov/floodplain-management/community-rating-system#participating>.

⁵ Simmons, K. & Kovacs, P., *Real Estate Market Response to Enhanced Building Codes in Moore, OK*, *Investigative Journal of Risk Reduction* (Mar. 2018) (stronger building code had no effect on the price per square foot or home sales).

⁶ NEHRP Consultants Joint Venture, *Cost Analyses and Benefit Studies for Earthquake-Resistant Construction in Memphis, Tennessee*, NIST GCR 14-917-26 (2013) (adopting stronger codes would add less than 1-percent to the construction while reducing annualized loss—in terms of repair cost, collapse probability, and fatalities—by approximately 50-percent).

California Fire Prevention Officers Association

3620 American River Drive Ste. #230, Sacramento, CA 95864

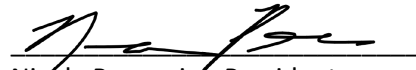
info@firepreventionofficers.org | (916) 442-0307

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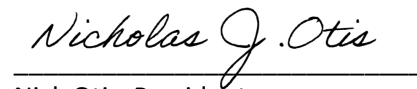
Moreover, extensive studies have shown that modern building codes do not significantly impact housing affordability.^{7,8} No peer-reviewed research contradicts this finding. For instance, recent studies indicate that adopting model residential codes only raises a home's purchase price by about half a percentage point over a 30-year period.⁹ Other studies found no significant evidence that California's codes affect construction costs.¹⁰ In fact, flood-resilient provisions in these codes can lower net monthly mortgage and flood insurance costs by around 5%,¹¹ while their mitigation benefits have been shown to reduce post-disaster mortgage delinquency rates by as much as 50%.¹² According to a report by Home Innovation Research Labs for the National Association of Homebuilders, the 2024 International Residential Code could save homeowners up to \$2,200, with benefits applicable across all regions and climate zones.¹³

As currently drafted, AB 306 would prevent the state from realizing these vital benefits for nearly a decade. We share the authors' concerns regarding housing affordability and are eager to collaborate on solutions that do not compromise building safety and resilience. Therefore, we oppose AB 306.

Thank you for your consideration.



Nicole Pesqueira, President
California Fire Prevention Officers
Southern Division



Nick Otis, President
California Fire Prevention Officers
Northern Division

7 Porter, K., [Resilience-related building-code changes don't affect affordability](#), SPA Risk LLC Working Paper Series 2019-01 (2019) (over the nearly 30-year period studied only increased a home's purchase price by around a half a percentage point in earthquake country or in an area affected by riverine flood).

8 California Statewide Utility Codes and Standards Program, [Report – New Home Cost v. Price Study](#) (2015).

9 Association of State Floodplain Managers, [Comments in Response to FR-6187-N-01](#), White House Council on Eliminating Barriers to Affordable Housing Request for Information (Docket HUD-2019-0092).

10 CoreLogic, [Can Modern Building Codes Impact Mortgage Delinquency After Hurricanes?](#) (Aug. 2023).

11 Home Innovation Research Labs, [Estimated Costs of the 2024 IRC Code Changes](#) (July 2, 2024).