

BUILDING STANDARDS COMMISSION

2525 Natomas Park Drive, Suite 130
 Sacramento, California 95833-2936
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June 1, 2026

John Carroll, john.carroll@sfgov.org
 City and County of San Francisco, Board of Supervisors
 San Francisco City Hall, Room 244
 San Francisco, CA 94102

Re: Ordinance # 230-25 (2025 San Francisco Existing Building Code) – Partial

Dear John Carroll:

The purpose of this letter is to provide the determination of the California Building Standards Commission (CBSC) following review of the ordinance referenced above from **City and County of San Francisco** on **3/25/2026** pertaining to local modifications to the provisions of the **2025** California Building Standards Code, Title 24, California Code of Regulations (Title 24).

The nonresidential code modifications are acceptable, however the residential code modifications are partially accepted for filing. This letter attests to the filing's compliance with the Health and Safety Code (HSC) Sections 17958.7 and 18941.5, with the exception of the deficiencies listed in the table below.

| | |
|-------------------------------------|---|
| <input type="checkbox"/> | Missing express findings for local code modifications based on local conditions pursuant to HSC Sections 17958.7(a) and (b) and 18941.5(b). |
| Deficiencies: | None |
| <input type="checkbox"/> | Missing expressly marked local code modifications as required pursuant to HSC Section 17958.7(a). |
| Deficiencies: | None |
| <input checked="" type="checkbox"/> | <p>Residential Occupancies Only. Pursuant to AB 130 (Committee on Budget, Chapter 22, Statutes of 2025), the amendments affecting residential units do not meet at least one of the criteria listed in HSC Sections 17958(b), 17958.5(c), 17958.7(c), and/or 18941.5(c):</p> <ul style="list-style-type: none"> (1) Changes are substantially equivalent to filing in effect as of 9/30/25. (2) Changes are necessary as emergency standards to protect health/safety. (3) Changes relate to home hardening. (4) Changes relate to home hardening by a fire protection district (not under CBSC's jurisdiction). (5) Changes are necessary to permit mixed-fuel residential construction. (6) Changes related to administrative practices proposed during intervening period. |
| HSC Criteria: | Deficiencies: |
| (1) | The newly added Sections 304.5, 307.1, 307.2, 307.3, 805.2.1, 1006.3.1, and 1102.2.1 are not compliant with AB 130. |
| (2) | N/A* |
| (3) | N/A* |

| | |
|--|------|
| (4) | N/A* |
| (5) | N/A* |
| (6) | N/A* |
| * Changes submitted do not include modifications that apply to this criterion. | |

If the filing, including the item(s) identified in the table above, are corrected and resubmitted (assuming the modifications are in alignment with AB 130), CBSC will again review the submittal for a fully acceptable for filing determination.

Additional information:

Please note that local modifications to Title 24 are specific to each code edition. Amendments to each triennial edition of the code must be adopted by the authority having jurisdiction and filed with CBSC to become effective or operative.

Model Code Adoption: Local governments may adopt other model codes, provided the adoption of such model codes does not conflict with state law, building standards or other adopted California regulations.

Fire Protection District: Per HSC Section 13869.7, ordinances making modifications to Title 24, require such ratified ordinances and express findings to be filed with the Department of Housing and Community Development (HCD), Division of Codes and Standards, State Housing Law Program, rather than CBSC.

Energy efficiency: Ordinances making modifications to the energy efficiency and conservation provisions in the California Energy Code, Part 6 of Title 24, may require approval from the California Energy Commission pursuant to Public Resources Code Section 25402.1(h)(2).

If you have questions or need further information, please contact me at (916) 263-0916.

Sincerely,

Woo Cheong

Woo Cheong
Associate Architect