

# AB 671 - Accelerated Restaurant Building Plan Review: California Retail Food Code: Tenant Improvements (Frequently Asked Questions)

February 2026

ENVIRONMENTAL HEALTH



COUNTY OF LOS ANGELES  
**Public Health**

## Overview

On October 9, 2025, Assembly Bill 671 (Wicks) was enacted and became effective on January 1, 2026. This new law aims to speed up restaurant tenant improvement projects and streamline the plan approval process by amending the Government Code, the Business & Professions Code, and the California Retail Food Code (CRFC). This document focuses only on the changes to the CRFC, which include a newly mandated resubmittal review turnaround time for complete plan submissions.

## Statutory Reference

AB 671 amends Section 114380 of the Health and Safety Code by adding subsection (f). The new provisions establish specific timelines and deemed-approval rules for restaurant tenant improvement plan reviews.

## Scope of Application

This applies only to **restaurant tenant improvement** plans. It does not apply to other food facilities, such as convenience stores, commissaries, or mobile food facilities, or to the construction of a new building.

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### 1. When will the law take effect?

January 1, 2026.

### 2. Does AB 671 remove any environmental health department oversight in the food facility permitting process?

No. AB 671 does not remove the environmental health department's oversight. Local environmental health departments may continue to conduct inspections and plan reviews as necessary to ensure compliance with applicable health and safety codes.

### 3. What is the definition of a restaurant?

For the purposes of this legislative change, a restaurant is defined in Section 1474 of the Labor Code as a retail food establishment that prepares, serves, and vends food directly to the consumer and is not a fast-food restaurant.

### 4. What is the definition of tenant improvement?

Tenant improvement refers to a modification to the interior of an existing building.

### 5. Have there been any changes to the initial plan review turnaround time?

No. Initial plan reviews should still be completed within 20 business days.

## 6. What is the definition of a “complete plan”?

The bill does not define a complete plan, and its interpretation is left to each jurisdiction. However, a reasonable complete plan typically includes:

- A completed application for plan submittal
- A menu equivalent to what will be shared with the public
- Successful submission and processing of payment for plan review
- A full set of plans, including but not limited to:
  - Title Sheet
  - Floor Plan
  - Equipment Plan and Schedule
  - Mechanical Plan and Schedule
  - Plumbing Plan and Schedule
  - Finish Plan and Schedule
- Specification sheets
- Physical finish samples
- Standard Operating Procedures (if applicable)

**Note:** For remodel projects, only the applicable items must be submitted.

## 7. What does the new law say about resubmittal review turnaround time?

Resubmittals should be reviewed within 10 business days. However, unlike initial plan reviews, the bill does not specify that plans will be automatically deemed approved if they are not reviewed within that timeframe.

## 8. Would all resubmittals need to be reviewed within the mandated 10 business days?

Yes. Plan resubmittals, which are plans submitted with only changes directly linked to comments or corrections issued by Public Health, should be reviewed within 10 business days.

## 9. What’s the difference between “resubmittals” and “change of scope”?

**Resubmittals** address only the items identified by the environmental health department as needed corrections. Resubmittals should be reviewed within 10 business days.

**A change of scope** includes plans submitted with changes outside the scope of the issued correction letter or with changes to the scope of work or operations that go beyond identified corrections. Change-of scope revisions will be reviewed within 20 business days.

### Examples of Resubmittals:

- Relocating or resizing a sink, floor sink, or floor drain per correction comments
- Changing finish materials that were previously not approved
- Adding missing compliance details (e.g., cove base, backsplash height, floor slope)
- Providing missing equipment data sheets or sanitation listings
- Correcting labeling errors on plan sheets
- Adjusting lighting or ventilation details as requested
- Revising plumbing or electrical layouts solely to address cited violations

### Examples of Change of Scope:

- Adding new rooms, bars, or food prep areas not previously shown
- Changing the type or location of major equipment (e.g., new hood, walk-in cooler)
- Expanding plumbing or electrical systems beyond prior corrections
- Modifying the construction scope (e.g., converting dry storage to food prep)
- Introducing operational changes that affect classification (e.g., prepackaged to open food handling)
- Adding equipment requiring referral to other agencies (CDFA, FDA, USDA)
- Submitting partial plans that conflict with prior submittals
- Changing contractor notes, installation methods, or ceiling or floor systems not previously reviewed

### 10. What is the process if revised plans include new information not previously reviewed?

If revised plans include new information not previously reviewed, they will be considered a **change of scope**. The applicant will be notified as soon as possible that the revised plans may require **up to 20 business days** for review, as they are not a resubmittal subject to the 10-business day review timeline. New comments or corrections may be issued based on the newly submitted information.

**Restaurant Tenant Improvement Plan Review Timeline**

Type of Submittal	Requirement	Review Timeframe	Notes
<b>Initial Review</b>	Public Health must approve or deny a complete tenant improvement plan.	Within 20 business days	Plans are *deemed approved if no action is taken within 20 business days on a complete submittal.
<b>Resubmittal</b> (plans addressing only changes directly linked to comments or corrections issued by EH)	Public Health's review must be limited to previously identified corrections.	Within 10 business days	Code does not state that deemed approval applies to resubmittals. Open to interpretation.
<b>Change of Scope</b> (plans include changes or new information outside of the scope of the correction letter)	Public Health's review will include new information. Not considered a "resubmittal".	Within 20 business days	Plans are deemed approved if no action is taken within 20 business days on a complete submittal.

**\*Deemed approval means that the plans will be considered approved if the action is not completed during the stated timeframe.**