

May 2, 2022



Quality Housing • Ethics • Professionalism



The Honorable Richard Bloom  
California State Assembly  
1020 N Street, Suite 8130  
Sacramento, California 95814

**RE: AB 2597 (Bloom) Dwelling Unit Standards - OPPOSE**

Dear Assembly Member Bloom:

On behalf of the members of the California Apartment Association, I am writing to inform you that CAA has taken an oppose position on AB 2597, your bill that will require any building with a dwelling unit to maintain adequate cooling and provide that the lack of cooling is a substandard condition for human habitation.

The State Legislature has rightfully avoided the establishment of building codes in statute. AB 2597 circumvents California's building code adoption process by determining in statute what the result will be. Many areas of the state have never needed a cooling unit based on the historic temperatures. The building code adoption process should review the current climate and take into consideration the significant electrical load that a mandated cooling system will add to our electrical grid. Additional research and examination is also needed by the California Energy Commission to address the additional load. At the same time, it would be inappropriate to update the state's Health and Safety Code to declare a building substandard when no cooling standards are yet adopted by regulators.

AB 2597 also does not take into consideration that retrofitting an old dwelling unit with a cooling unit is not a simple matter. Most older apartments are not designed to allow for the later installation of a central cooling system and separate window inserts are not energy efficient. They will represent an increase in demand during peak loads that currently do not exist. We agree with the Assembly Housing Committee's analysis that any review of building code amendments relating to "cooling systems" must take into account "different approaches for achieving the goal of creating safe indoor air temperatures, including, but not limited to, improved insulation, air sealing, increased shade, cool roofs, fans, heat pumps, and, where necessary, air conditioning. It is the intent of the Legislature that the standards prioritize approaches that support the state's clean energy, air quality, and greenhouse gas reduction goals where such approaches can feasibly achieve the goal of a safe indoor air temperature."

The California Apartment Association is the largest statewide rental housing trade association in the country, representing over 50,000 single family and multi-family apartment owners and property managers who are responsible for over 2 million affordable and market rental units throughout the State of California. Thank you for considering our concerns.

Sincerely,

**CALIFORNIA APARTMENT ASSOCIATION**

A handwritten signature in blue ink, appearing to read 'Debra Carlton', with a long, sweeping flourish extending to the right.

By  
Debra Carlton  
Executive Vice President, State Public Affairs

cc: Assembly Appropriations Committee