



June 15, 2022

The Honorable Scott Wiener, Chair  
Senate Housing Committee  
1021 O Street, Room 3330  
Sacramento, California 95814

**RE: AB 2597 (Bloom) Dwelling Unit Standards (Amended 6/14/22) - OPPOSE**

Dear Chair Wiener:

On behalf of the California Building Industry Association (CBIA) and the California Apartment Association (CAA) we write to express our strong opposition to AB 2597. This bill would require the California Building Standards Commission, commencing with the next triennial edition of the California Building Standards Code adopted after January 1, 2023, to adopt, approve, codify, and publish mandatory building standards for maximum indoor ambient air temperature in newly constructed dwelling units.

CBIA and CAA are opposed to this bill for the following reasons:

1. *AB 2597 Circumvents the State Regulatory Process:*

For over 30 years, the State Legislature has rightfully avoided the establishment of building codes in statute. Instead of directing the Department of Housing and Community Development (HCD) and the California Building Standards Commission (BSC) to investigate the issue, and then determine if regulatory action is needed, AB 2597 leaps over the administrative process and simply mandates HCD to develop, and the Building Standards Commission to adopt mandatory building standards to require air-conditioning in existing dwelling units. This circumvents California's building code adoption process by determining in statute what the result will be.

2. *Major Technical and Implementation Issues:*

Retrofitting an old dwelling unit with a cooling unit is not a simple matter. For example, many older apartments are not designed in such a way as to allow for the later installation of a central A/C system. As such, compact (window insert) units will be used. Even a small one-bedroom unit may require several of these systems in order to lower the ambient temperature of the whole unit to some predetermined temperature level and keep it there for extended periods of time. It is estimated that each of these units could cost between than a \$1,000 with the added changes to the electrical system for the unit with no guarantee the systems can maintain temperatures required.

3. *Increased Monthly Utility Bills:*

During the summer months (May-October), the cost to run the A/C will usually be the single greatest use of energy in the home, and the most expensive as it is used during the "peak load" time period when energy costs 2-3 times more than it does in the morning hours. The impact of this bill on the monthly budgets of Californians especially those of lower incomes needs to be understood before proceeding with AB 2597.

4. *Challenges with the Capacity of the Electric Grid:*

This bill would add a significant electrical load and demands to the grid that is already fragile during peak load time periods. Property owners in our older urban core cities report that even today with added cooling systems to older units have caused frequent power outages. Individual window insert units are power intensive and will represent an increase in demand during peak loads that currently do not exist. Additional research and examination by the California Energy Commission is needed to investigate ways to address the additional load to our grid.

California is currently in a severe housing crisis. To address this crisis, we need to enact legislation that would increase the production of housing by reducing costs and regulatory barriers. Unfortunately, AB 2597 adds significant cost and regulations to the homebuilding process. We look forward to continued conversation with the bill's author and sponsors but for the abovementioned reasons and more we remain opposed and urge your "No" vote on AB 2597.

Sincerely,



Cornelious Burke  
Vice President of Legislative Affairs  
California Building Industry Association



Debra Carlton  
Executive Vice President, State Public Affairs  
California Apartment Association

cc Members, Senate Housing Committee  
Assembly Member Bloom