



California Apartment Association
4401 Atlantic Ave. Suite 200
Long Beach, CA 90807

January 19, 2024

The Honorable Chair Horvath
Los Angeles County Board of Supervisors
500 W. Temple St.
Los Angeles, CA 90012
VIA Email

Re: (Item 4) Establishing a Safe Maximum Temperature Threshold for Residential Units

Dear Board Chair Horvath and Supervisors,

The California Apartment Association (CAA) represents local housing providers who are involved with a range of rental properties from those that offer a single unit to large apartment communities as well as businesses that provide goods, services, and support to the housing industry. Our members touch on the everyday lives of many county residents. We have a keen interest in the pursuit of fair and equitable housing policies.

We respectfully request that a comprehensive study be conducted prior to any ordinance direction. CAA has long requested the county conduct appropriate engagement, and analysis before requesting specific ordinance outcomes. Housing and climate issues are often complex and need to be informed by relevant fact gathering and considerations.

A report should include:

1. State building code interaction and adoption process.
2. State legislative review and current actions on this issue.
3. Peak load capacity to the energy grid, potential impacts, and ability.
4. Energy efficiency of window air-conditioning inserts and load impacts.
5. Regional energy load review and assessment.
6. Alternative cooling strategies.
7. Safety considerations of installation.
8. Impacts on the County's climate goals & energy reduction plans.
9. Cost assessment associated with retrofitting older dwelling units for air conditioning.
10. Capital expenditure funding sources.
11. Impacts on housing affordability and utility bills.

CAA appreciates the direction to include stakeholder feedback, but the motion does not appear to request an analysis and study of the issue nor its intersecting parts. This item should be reviewed holistically to determine appropriate action and ensure policies are not in conflict with its own housing and climate goals while also potentially creating an unfunded mandate. The types of upgrades discussed in the motion potentially require significant capital expenditure, building rehabilitation and will have a financial impact on residents.

Apartment buildings were built to code at the time and operators find themselves facing changing climate conditions through no fault of their own. There could be unintended consequences which departments and the Board of Supervisors should be aware of prior to ordinance creation. We respectfully ask that a thorough and holistic study be conducted in concurrence with stakeholder feedback and before an ordinance is directed.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Sutton". The signature is written in a cursive style with a long horizontal stroke at the end.

Fred Sutton
California Apartment Association