



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

August 4th, 2025

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

Re: (Item 14) *OPPOSE UNLESS AMENDED*
Establishing a Safe Maximum Temperature Threshold for Residential Units

Dear Chair Barger and Honorable Members of the Board of 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. I am writing to express our position of *Oppose Unless Amended* on Item 14 concerning a proposed safe maximum temperature threshold.

Commitment to Fair Housing Policy

We are committed to the development of fair, practical, and equitable housing policies that consider both resident well-being and the operational realities of housing providers. In 2024, [we recognized](#) the Board's support for exploring this concept and appreciated the directive to engage stakeholders in meaningful discussions. CAA participated in multiple stakeholder meetings and repeatedly offered pragmatic recommendations to help shape a feasible policy.

Unfortunately, despite this engagement, the county has not produced formal analysis or offered explanations for accepting or rejecting the stakeholder's suggestions. Transparency in how decisions are made is vital for ensuring trust and achieving workable outcomes.

Request for a Phased and Practical Path Forward

We urge the Board to adopt a more practical and phased approach, specifically, reducing the threshold requirement from *all rooms to ONE room* in existing buildings. This alternative, supported by the [RAND report](#) (Page 24), provides a safe harbor during periods of extreme heat and offers a realistic compliance starting point for older structures. After evaluating lessons learned during an initial implementation period, the county could then consider expanding the standard.

There are critical logistical issues related to electrical capacity that must be addressed. Air conditioning is among the most energy-intensive systems in a household, and many older buildings lack the infrastructure to handle the demand imposed by modern cooling appliances. Without a feasibility study or utility impact analysis, the risk of electrical overloads or brownouts remains unmitigated, putting both housing providers and residents at risk.

Outstanding Policy Concerns

We highlight the following issues that were never addressed in the stakeholder meetings:

1. Measurement Duration Standards

The ordinance fails to specify how long the temperature must exceed the designated threshold before a violation is determined.

- *Clear, science-based duration threshold should be included to ensure consistency and fairness in enforcement. No standard increases the likelihood of an A/C requirement.*

2. Resident Responsibilities

The current proposal lacks provisions requiring residents to maintain portable units, store them properly, engage in passive cooling strategies or use them before filing a complaint.

- *Resident responsibility must be clearly articulated in the ordinance.*

3. Definition and Installation of Portable Devices

Allowing residents to hang window units presents serious safety hazards. While the ordinance gestures toward safeguards, the language remains vague and difficult to enforce.

- *We recommend removing hanging window units from the definition of approved devices unless specifically authorized by the housing provider.*

4. Temperature Threshold Consistency

The proposed threshold of 82°F is inconsistent with the [California Department of Industrial Relations'](#) indoor temperature standard. [Other jurisdictions](#) use a bifurcated approach, and the original [2024 board motion](#) also referenced a dual-threshold system.

- *Why is Los Angeles County diverging from these established practices?*

A Call for Pragmatism

CAA supports Supervisor Janice Hahn's amending motion that allows some housing providers to meet the threshold in at least one habitable room rather than all rooms. This practical amendment reflects the recommendations of the [RAND](#) report. We commend Supervisor Hahn's leadership in advancing a more workable solution that can serve as a foundation for broader policy implementation. This concept should be expanded.

Housing providers are working with residents on these issues. We acknowledge the growing impacts of climate change. However, rental housing providers are being asked to retrofit buildings that were constructed in accordance with earlier code standards without sufficient planning support or regulatory flexibility. The Board must consider the implications of this ordinance, including potential consequences that could significantly impact housing affordability.

CAA respectfully urges the Board to implement a phased approach while conducting necessary analysis for expansion. This would allow the development of a policy that achieves the aims of the County while ensuring compliance is both feasible and equitable.

Sincerely,



Fred Sutton
California Apartment Association