



California Apartment Association
Los Angeles County

February 9, 2026

Board of Supervisors
County of Los Angeles
VIA EMAIL

Item 20: OPPOSE: Emergency Expansion of Rent Debt Threshold

Dear Chair and Members of the Board of Supervisors,

The California Apartment Association (CAA), representing thousands of rental housing providers throughout Los Angeles County, opposes the proposal to utilize emergency powers to expand the rent debt threshold countywide.

CAA supports policies that promote housing stability. However, this expansion is an improper use of emergency power, will be counterproductive, disproportionately impact the economically disadvantaged, and make housing harder to access.

Improper Use of Emergency Authority

Los Angeles County has increasingly relied on emergency authority to justify extreme policies. What first started during COVID has evolved into a troubling pattern of using emergency declarations to advance policy agendas.

Most city jurisdictions disagree with the county's approach to housing policy as it has been proven to reduce the quantity and quality of housing. This would take harmful housing policy and impose it on jurisdictions against their will. These types of actions continue to erode trust in our local institutions.

Rent Relief, Not Insurmountable Debt

This will create debts that will become harder to pay as each month passes. You are setting individuals up to fail. The COVID moratorium was pitched as a *temporary* deferral of rents that would have to be repaid. As those moratoria expired, advocates then warned of a "tsunami" of evictions, underscoring the reality that once households fall significantly behind, it is extremely difficult to catch up.

The County recently launched a rent relief program for residents impacted by the 2025 fires. CAA has actively promoted this program and supports its expansion into a permanent rental assistance pool for tenants facing temporary financial hardship. Direct monetary assistance is the most effective way to stabilize households without destabilizing housing providers.

Fair Housing Laws

Housing providers are not permitted to inquire into a tenant's citizenship or immigration status. Doing so is prohibited under fair housing laws and exposes housing providers to significant legal liability. This proposal places rental housing providers in an untenable position by incentivizing nonpayment of rent without any lawful mechanism to assess eligibility.



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It is also unclear what, if anything, a resident would be required to declare to qualify. This ambiguity raises serious concerns. On one hand, it risks placing undocumented individuals in a position where participation in legal processes could feel unsafe or uncertain. On the other, vague standards invite abuse, a problem that was widely documented under prior County COVID policies.

Failure to Adhere to the Cluster Committee Process

This item should not be exempt from the cluster committee process. There is ample time to ensure meaningful deliberation. Increased federal immigration actions began early last year. Much like the use of emergency powers, the board continually cites emergency motions to circumvent the cluster process.

Unintended Consequences

This proposal will ultimately harm the very people the County intends to help. As financial risk increases, housing providers respond by raising screening standards, reducing flexibility, and becoming more cautious.

Continued regulatory uncertainty discourages long-term participation in the rental housing market. Housing providers make decisions based on predictable rules and enforceable contracts. Policies that encourage nonpayment are not imposed on other services and should not be normalized in housing.

A functional economy depends on the reasonable expectation that services rendered will be compensated. Under the current county ordinance, housing providers may be required to absorb unpaid rent on a rolling basis indefinitely, effectively compelling them to extend open-ended, no-interest loans. This structural flaw needs to be addressed.

Real Financial Impact on Housing Providers

Most housing providers lack the financial capacity to absorb prolonged nonpayment without jeopardizing their ability to operate, maintain their properties, and continue providing housing.

The majority of unlawful detainer proceedings are due to nonpayment of rent. It can take six months or longer to work its way through the courts. Even after a judgment in favor of the housing provider, it can take additional months for the Sheriff to restore possession of the property. Throughout this process, housing providers remain responsible for mortgages, property taxes, insurance, utilities, and ongoing maintenance.

Conclusion

CAA urges the Board to reject this extreme proposal and focus on proven alternatives. We urge the Board utilize targeted rental assistance to help desired populations and focus on policies that preserve the long-term health of the rental housing market.

Sincerely,

Fred Sutton

California Apartment Association