



**PUBLIC REQUEST TO ADDRESS  
THE BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS  
HOLLY J. MITCHELL  
LINDSEY P. HORVATH  
JANICE HAHN  
KATHRYN BARGER

**Correspondence Received**

The following individuals submitted comments on agenda item:			
Agenda #	Relate To	Position	
14.		Favor	<p><b>Name</b></p> <p>Agustin Cabrera</p> <p><b>Comments</b></p> <p>On behalf of Strategic Concepts in Organizing and Policy Education (SCOPE), I am writing to share our strong support the proposed ordinance establishing a Safe Maximum Indoor Temperature Threshold of 82°F for rental units in Los Angeles County and urge you to reject any attempts to delay or weaken it particularly efforts to create a two-tiered system.</p> <p>Extreme heat is a growing public health crisis in Los Angeles, disproportionately harming low-income renters, older adults, children, and those with chronic illnesses. No one should be forced to endure dangerous indoor temperatures due to where they live or what they can afford. This ordinance is a critical step toward ensuring safe, livable housing for all Angelenos.</p> <p>The 82°F threshold aligns with public health guidance and offers landlords flexibility through active or passive cooling methods. We strongly oppose Supervisor Hahn's amendment that would limit the requirement to just one habitable room per unit. All habitable rooms must be protected.</p> <p>Lastly, we urge that the ordinance be fully enforceable, with streamlined processes for renters to report violations, strong interdepartmental coordination, and full staffing to ensure timely implementation. Impacted renters must remain at the center of this effort. We welcome conversation with all offices on how to ensure proper implementation of this important ordinance.</p> <p>Best, Agustin Cabrera SCOPE LA</p>
			Alex Jasset
			Alex Jasset
			Alexandra Gay



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			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
14.		Favor	Anna Ress	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>I request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, I kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Sincerely, Anna Ress</p>
			Anna Saucedo	
			Barbara Ishida	<p>As a teacher in public education, it is crucial to be able to think and be in air that is cool enough. Housing temperature is crucial so that students and their families can come rested and healthy. It's not just about being able to function at school, it's about being able to function in life. Recently my house burned down in the Eaton Fire and we are now in an apartment. 82 degrees is pretty hot, but manageable. I know I get desperate when the temperature at night is 77 because of the insulation. Keeping the temperature down during the day is crucial for being able to sleep at night.</p>
			Ben Stapleton	



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Agenda #	Relate To	Position	Name	Comments
14.		<b>Favor</b>	Bridget Hauflaire	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Please feel free to reach out to me at <a href="mailto:bhauflaire@climateresolve.org">bhauflaire@climateresolve.org</a> with any questions.</p> <p>Sincerely, Bridget Hauflaire</p>



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			The following individuals submitted comments on agenda item:	
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14.		Favor	Bridgette Ramirez	<p>I urge you to adopt a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>I grew up in a house that didn't have air conditioning until just a year ago, so I know firsthand how bad the heat can be on physical and mental health. Even now, my family takes care to put reasonable limits to keep our indoor temperature around 80 degrees so as not to overtax the power grid and our electric bill.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk.</p> <p>The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p>
			Brittany Rivas	



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			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
14.		Favor	Brittany D Rivas	<p>Dear honorable board of supervisors,</p> <p>My name is Brittany D. Rivas, and I am a tenant in SD #4 and the Climate Adaptation and Resilience Enhancement (CARE) Coordinator for Communities for a Better Environment. We work with frontline community members of various incorporated and unincorporated communities (such as Walnut Park, Florence- Firestone, Harbor City, etc.) of Southeast LA and Wilmington. I support the safe indoor temperature ordinance as originally proposed. Heat is the deadliest extreme weather event and it gets worse every year. I do not support the amendment Supervisor Hahn is proposing and know our communities need to have all habitable rooms be met. This amendment by Supervisor Hahn does not include a sunset provision impacting climate resilient policies that our communities need and deserve.</p> <p>Low income communities of color in frontline neighborhoods like the one I live and work in feel the brunt of heat impacts with ongoing poor air quality outside their homes. Our communities are living near refineries, oil drilling, metal dismantlers, &amp; freeways facing air pollution all year long. Not to mention how redlining has historically forced these inequities into our communities leaving us with very high needs for green space, tree canopy and more. Heat only makes these conditions worse for our families and neighbors. I am in a rental unit with poor insulation where heat has been difficult in the past couple of years and have been privileged enough to use a portable air conditioner to find some relief during the work day to some degree. As someone who works from home with access to this system and a great landlord; this is not the case for all tenants.</p> <p>Without immediate and meaningful action, the health and safety of too many Angelenos will continue to be jeopardized inside their own homes. No one should be forced to endure dangerous indoor temperatures simply because of where they live or what they can afford. Tenants need protection from these conditions. Adequate cooling should be a habitability requirement in ALL homes and rooms just like heating is.?Please vote yes to center community health by passing the safe indoor temperature threshold as originally proposed. Thanks for your leadership and consideration on this important matter.</p> <p>Sincerely, Brittany D. Rivas</p>
			Bruce Saito	



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14.		Favor	Caleb Huang	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Please feel free to reach out to me at <a href="mailto:chuang@climateresolve.org">chuang@climateresolve.org</a> with any questions.</p> <p>Sincerely, Caleb Huang</p>



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14.		Favor	Carey Bennett	<p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Sincerely, Carey Bennett</p>
			Catherine Baltazar	
			Chelsea Kirk	
			Chelsea Lee Byers	
			Daniel Hom	



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			The following individuals submitted comments on agenda item:	
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14.		Favor	Darielle Green	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Sincerely, Darielle</p>
			David Eisenman	<p>David P. Eisenman, MD, MSHS Professor of Medicine, UCLA 124 Lighthouse Mall Marina del Rey, CA, 90292 deisenman@mednet.ucla.edu 310-422-2002 August 1, 2025 Los Angeles County Board of Supervisors Kenneth Hahn Hall of Administration 500 W. Temple Street Los Angeles, CA 90012 RE: Support for Safe Maximum Indoor Temperature Ordinance (August 5, 2025 Draft)</p> <p>Dear Supervisors,</p> <p>As a physician practicing in Los Angeles County and a researcher focused on the health impacts of extreme heat, I am writing in strong support of the proposed ordinance establishing a Safe Maximum Indoor Temperature Threshold of 82°F for rental units in Los Angeles County. I respectfully urge</p>

As of: 8/6/2025 7:00:10 AM





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you to oppose efforts to delay implementation or modify the ordinance into a two-tiered system.

Extreme heat is a growing public health crisis—now one of the leading causes of weather-related mortality in the United States. Here in Los Angeles County, it disproportionately harms our most vulnerable residents: older adults, individuals with chronic illnesses, young children, and low-income renters in buildings without adequate cooling. As a physician, I know just how dangerous—and how inequitable—this crisis can be.

My research has focused on identifying and addressing heat-related vulnerability. I developed the UCLA Heat Maps and led the analysis behind CalHeatScore, which warns communities about heat waves through its four level system and helps build climate resilience across California. Studies consistently highlight one key fact: indoors is not always safe, especially for tenants living in older buildings or communities historically deprived of infrastructure investment.

This ordinance is a necessary and pragmatic response. The 82°F threshold aligns with public health guidance and provides an enforceable standard that landlords can meet through either active or passive cooling. The flexibility is important, but so is the consistency. The ordinance enables independent cities within the County to adopt the same protections, ensuring equitable standards across jurisdictions.

With climate impacts intensifying, we cannot afford to wait. Every delay places more lives at risk. This ordinance reflects science, equity, and common sense. I strongly urge you to adopt the Safe Maximum Indoor Temperature Ordinance as currently drafted.

Thank you for your leadership in advancing public health, housing equity, and climate resilience.

Sincerely,

David P. Eisenman, MD, MSHS

Diego Rodrigues

Dillon Foster

Recently, UCLA released a study with the findings that many communities of color, even more specifically Latinx majority communities like the East San Fernando Valley, South Central LA, and South East Los Angeles communities face issues of habitability around extreme heat because many of these communities have older units of housing that are not designed for extreme heat and therefore have less ventilation while lacking adequate air conditioning systems compared to white communities, wealthier communities, and more recently built communities. While I hope to see policy to require the units be required to have heat pumps (environmentally friendly A/C units) or similarly energy efficient and environmentally friendly A/C units installed



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(Having sustainable A/C systems are a core requirement to building a sustainable and green housing stock not just in newly built units but in older units too) and maintained with the cost of installation and maintenance to be bared by whichever entity is most able to bare the brunt of the cost (perhaps even the fossil fuel industry that is responsible for the heating of our planet since the onset of the industrial revolution), I support this common sense measure to establish a heat threshold for housing habitability. Sometimes, environmental justice looks like expanding clean energy sources. Sometimes environmental justice looks like creating safer streets that are more accessible to sustainable modes of transportation. Sometimes environmental justice looks like creating economic opportunity through climate action. Sometimes, it looks like expanding green space or implementing climate resilient infrastructure. Other times it looks like policy changes like this that allow for a county wide approach to policy that allows communities of color to install systems to actively or passively cool their homes free of punishment.

Extreme heat can be deadly to anyone at certain thresholds but this is even more applicable to people with underlying health conditions, young people, the elderly, and those that are pregnant. As someone who grew up in areas of the county that were particularly susceptible to extreme heat in units of housing without air conditioning that were poorly ventilated, I understand first hand how dangerous this can be for those that are vulnerable who may not be able to seek out cooler places of refuge such as cooling centers. I witnessed this firsthand as I have family members that were susceptible to this (underlying health conditions) as well as being susceptible to this as a young person. During the summers, my family would flee our home during the day because temperatures inside our home would become dire – sometimes reaching upwards of 125 degrees fahrenheit. We simply could not survive in our home. For many, this is also their reality but it is more dangerous for them to flee due to socioeconomic conditions of the moment we live in. Any delay to this policy change locks this reality in for them for longer. This action is long overdue. Even if the County and other entities mentioned in regards to this policy are unable to cover the costs of sustainable A/C systems, this policy change strikes a balance that allows tenants to take action into their own hands which is a better outcome then delay is. Even if there is more logistical issues that need to be figured out to allow for our entire housing stock to be sustainably cooled, we can pass this policy today and then pass more policy down the road to come up with a solution that is practical to installing sustainable Air conditioning systems in our entire housing stock – allowing us to protect our most vulnerable while solving larger issues as we go.

Furthermore, this motion is particularly of importance for reasons other than disabilities and health conditions. Under this current presidential administration, immigrants and people of color more broadly are under the threat of detainment and deportation just by being caught outside or going to work or doing whatever they need to do with their day. Some people are disappearing off our streets while walking to and from work or the grocery store at the hands of ICE. Other people are being ripped out of their cars (or



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	other modes of transportation) or from their jobs or daily activities. It's simply unsafe for communities of color and immigrants in Los Angeles. This measure would allow these communities the safety of refuge in their own homes as it is simply unsafe for them to seek out cooling centers. This measure protects our most vulnerable in more ways than one. We must not let the most deadly effects of the climate crisis that affects Los Angeles make our most vulnerable more vulnerable.
Dwight D Scott	
Eduardo De La Riva	
Enrique Huerta	Support for the single 82-degree indoor residential heat standard for all residences. Oppose the two-tiered system.
Eric Farrar	
Fernando Ochoa	
Gina Goodhill	
Gissela Chavez	<p>My name is Gissela Chavez, and I am a tenant in SD #4. I support the safe indoor temperature ordinance as originally proposed. Heat is the deadliest form of extreme weather and it gets worse every year. I do not support Supervisor Hahn's amendment because our communities deserve their whole home to be habitable and the County deserves strong climate resilience initiatives. If the Board is considering Hahns amendment-I urge the Board require at least all bedrooms + 1 room (like a living room) to be enforced by the maximum temperature and the "one habitable room" amendment be bound by a sunset provision...</p> <p>Due to the fear of immigration enforcement in the region, many community members have sheltered in their homes- forcing them to endure unsafe heat conditions without proper cooling.</p> <p>Also, Landlords make passive income from rent and have plenty of levers to recover costs of upgrades (like rent increases or subsidy programs). Tenants on the other hand can't afford to install cooling systems or are prohibited from doing so by their landlords.?</p> <p>There are 72,000 units throughout unincorporated LA County whose tenants need protection from climate change. Adequate cooling should be a habitability requirement in ALL homes. Please vote yes to center community health and those most vulnerable to heat risks by passing the safe indoor temperature threshold as originally proposed. Thank you for your time and consideration on this critical matter.</p>
Grace Hut	See attached letter detailing SAJE's position of support for the Maximum Indoor Temperature Threshold Ordinance.
Grace Hut	



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Guadalupe Gonzalez	
Hernan G Molina	The City of West Hollywood supports the adoption of the draft ordinance establishing maximum indoor temperature threshold for rental housing units in the unincorporated areas of Los Angeles County.
Isabel Parada	
Isabella Potenzini	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Sincerely, Isabella Potenzini</p>
Jacqueline Walukas	
Jannet A Torres	
Jenna Cobb	<p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of Los Angeles County are at risk. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p>



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Joey Klascius	<p>Dear Board of Supervisors,</p> <p>I'm writing as a resident of the Antelope Valley to support the Safe Maximum Indoor Temperature Threshold Ordinance—Item 14 on your agenda.</p> <p>Out here, we know how brutal the heat can get, tempsto climb well over 100 degrees. Without proper cooling, it becomes dangerous, especially for seniors, kids, people with health issues, and families who rent and can't afford to run or install air conditioning.</p> <p>This ordinance sets a fair standard: making sure indoor temperatures don't go above 82 degrees. That might not sound cool, but it's a lot safer than what many people are dealing with now. It also gives landlords options for how to meet the rule, whether it's through air conditioning or other cooling methods.</p> <p>Please pass the ordinance as it stands and don't delay or water it down. People's health, and lives, depend on it. And this issue will only get worse.</p> <p>Thank you for standing up for our communities and helping us stay safe in this heat.</p>
Justin Truong	<p>Requiring all rental units in LA County to maintain a maximum indoor temperature of 82-degrees will save consumers money and keep people safe. It would really mean a lot if you added your voice to this important cause by telling members of the Board of Supervisors to vote AYE on a single 82-degree indoor residential heat standard.</p>
Karen Romero Estrada	
Kelly Gonez	
Kelly Gonez	<p>attached letter in support of this item.</p>
Kelsey Redding	<p><b>SUPPORT – A SINGLE 82-DEGREE INDOOR RESIDENTIAL HEAT STANDARD</b></p> <p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact</p>



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	<p>neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses. Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard. Please feel free to reach out to me at kredding8@gmail.com with any questions. Sincerely, Kelsey</p>
Kenny Montejano	
KIMBERLY G AYERS	<p>Extreme heat has become so much a part of our lives that air conditioning and other mitigation is not a luxury but a necessity. Please recognize this new fact and protect our tenant neighbors! Thank you</p>
Laura Gracia	
Laura Gracia	
Lenore N Dowling	
Lia Cohen	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Best, Lia</p>
Lyric Kelkar	<p>Please see the attached letter in support of this ordinance on behalf of the</p>



**PUBLIC REQUEST TO ADDRESS  
THE BOARD OF SUPERVISORS  
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MEMBERS OF THE BOARD

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LINDSEY P. HORVATH  
JANICE HAHN  
KATHRYN BARGER

**Correspondence Received**

	Office of Eunisses Hernandez, Council District 1 in the City of Los Angeles.
Marc Futernick	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Please feel free to reach out to me at mfutah@aol.com with any questions.</p> <p>Sincerely, Marc Futernick, MD</p>
Mark Gaynor	In support of the motion without amendment
Marta Segura	Good morning Honorable Supervisors, As the Chief Heat Officer for the City of LA, I fully support this ordinance, as it will move the region and legislation in the right direction in protecting our most vulnerable communities from Heat Injury and death at home. More can be done by Landlords and tenants should have the right to install and request modifications to their unit to ensure thermal comfort and safety. Thank you.
Maru Cruz Castillo	
Mireya Aguilar	
Morris Rocha	
Rene Jimenez	
Robert A Berlin-Williams	<p>SUPPORT – A SINGLE 82-DEGREE INDOOR RESIDENTIAL HEAT STANDARD</p> <p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat</p>

As of: 8/6/2025 7:00:10 AM





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	<p>island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Please feel free to reach out to me at <a href="mailto:rberlinwilliams@climateresolve.org">rberlinwilliams@climateresolve.org</a> with any questions.</p> <p>Sincerely, Robert Berlin-Williams</p>
Ryan Sanchez Gonzalez	
Samantha Herrador	<p>I'm reaching out to share my support for the Safe Maximum Indoor Temperature Threshold Ordinance; Item 14.</p> <p>As extreme heat events become more frequent and dangerous across LA County, this ordinance is a vital public health measure to protect our most vulnerable residents, particularly in the Antelope Valley, where the average temperature in the late spring and summer averages 90+ degrees and extreme heat events push temperatures past 100.</p> <p>I urge the Board to support the ordinance as drafted on August 5, 2025, and to oppose any efforts to delay or shift to a two-tiered approach that would leave many tenants behind.</p> <p>Thank you for your continued leadership and commitment to health, equity, and climate resilience.</p>
Samantha M Nuno	<p><b>SUPPORT – A SINGLE 82-DEGREE INDOOR RESIDENTIAL HEAT STANDARD</b></p> <p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA</p>

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Selena Melgoza	<p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration, and intensity, and today, the residents of Los Angeles County are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses. Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p>
Sergio Lopez	
Shane Henson	
Stephanie Tapia Onate	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a</p>



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Steven H Meeks	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p>
Tanya Schwarz	<p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a</p>



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	Tanya Ortiz Franklin	
	Tommy R Fleming	<p><b>SUPPORT – A SINGLE 82-DEGREE INDOOR RESIDENTIAL HEAT STANDARD</b></p> <p>Dear Supervisor Hahn and LA County Board of Supervisors,</p> <p>We kindly request your leadership in adopting a single, clear, and unwavering 82-degree Indoor Residential Heat Standard. This life-saving regulation would greatly benefit many of your constituents, who, according to the 2022 LA County Vulnerability Assessment, are highly susceptible to the urban heat island effect.</p> <p>Enacting a single 82-degree indoor residential heat standard will prevent a confusing two-tiered system for landlords and tenants. Climate change-driven extreme heat is increasing in frequency, duration and intensity, and today, the residents of District 4 living along the 710-and-605 corridors are most at risk. The LA County Tree Canopy Map reveals that many of these communities have too much pavement and fall significantly below the County's 18% average tree coverage. These high temperatures disproportionately impact neighborhoods vulnerable to extreme heat, where residents often have pre-existing medical conditions such as diabetes and hypertension, and are less able to absorb costly medical expenses.</p> <p>Thankfully, the County's proactive measures now provide you with an opportunity to enact an 82-degree standard, safeguarding residents during extreme heat days. For these reasons and more, we kindly urge you to vote "AYE" on the single 82-degree indoor residential heat standard.</p> <p>Please feel free to reach out to me at tommyruddfleming@gmail.com with any questions.</p>

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			Sincerely, Tommy Fleming
		Veronica Padilla	Pacoima Beautiful is in support.
		Wendy Miranda	
		Wendy Miranda	
		Wendy Miranda	My name is Wendy Miranda, I am with Esperanza Community Housing. I support the safe indoor temperature ordinance. Heat is the most deadly extreme weather condition and it gets worse every year. Tenants need protection from these conditions. Even in cooler parts of the County, rental units are not equipped to withstand heat waves. During a heat wave last September, coastal parts of the County saw record-breaking temperatures; LAX and Long Beach broke their all-time records by five degrees at 102 and 109 degrees respectively. Adequate cooling should be a habitability requirement in ALL homes just like heating is.
		Yvonne Watson	
		Yvonne Watson	Without Amendments!!!!!!
	<b>Oppose</b>	Amy Ash	The lifestyle of the United States, focused on consumption and creating "comfortable" capitalist focused lifestyles, created climate change. Through the destruction of land to create large homes with large yards, consumption of energy for air conditioning, use of petrol cars, we now face the possibility of the end of humanity. Yet, Americans are focused on air conditioning. There are people who live in homes that would require rewiring to install air conditioners. There are people who live on the street without access to any device to cool them. But most importantly, the actions of people in this country affect the rest of the world, who are either drowning or burning up due to the actions of people in this country. The only time this country took a single action to scale back emissions due to lifestyle changes, was inadvertently, during COVID, and it had a great positive impact. Yet this country boomeranged back to the consumption lifestyle worse than ever after restrictions were lifted. Now, it is careening forward, planet on fire be damned, to push for more emissions. This city should be looking for ways to restrict people's consumption of energy like wasteful office buildings, push for design changes in buildings to create natural cooling effects, push for more public pools and shade structures. Many of us grew up without air conditioning, yet this generation feels like everyone should have the same comforts of any wealthy person (as compared to the rest of the world). Americans should be ashamed that they continue with this consumption lifestyle and ignore its impacts on the rest of the world. It is depressing that non-profit organizations are pushing for 82 degrees, which is a normal summer temperature outside. It is sad that we are careening towards climate change but you are seeking ways to hide from it while birds and insects are dying from the heat. We are really cooked if this is the best you can do.
		Annette V Graw	
		Gina Hoskins	

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Jennette Toderick	
Jerard D Wright	<p>GLAR wants to thank Supervisor Mitchell for her sensible and responsible motions at the cluster to provide a workable pathway to implement the ordinance. The currently written ordinance has many questions than answers with respect to how to make this work for housing providers. In addition their is a question of liability for when a tenant brings a window slung AC unit and that AC unit falls on the property, who is liable for any harm and injury the falling of the AC unit? The ordinance leaves this wide open to interpretation which is a major concern to housing providers.</p> <p>Here are 5 other points that we have concerns with this ordinance with respect to its implementation.</p> <p>1) 86 DEGREES IS A CONSISTENT MEASURE BASED ON STATE HEALTH REGULATIONS</p> <ul style="list-style-type: none"><li>• The California Department of Industrial Relations set an indoor maximum temperature of 86 degrees Fahrenheit in June 2024 for all workplaces. There is no legitimate "health" reason that a residence should be cooler than an average workplace.</li><li>• Even regulations for "Residential Care Facilities for the Chronically Ill" allow temperatures up to 86 degrees. We need a maximum temperature of 86 degrees Fahrenheit to allow for more environmentally sensitive solutions such as evaporator coolers in most areas and in alignment with existing California laws.</li></ul> <p>2) HIGH CAPITAL COSTS WITH NO PASS THROUGH TO TENANTS</p> <ul style="list-style-type: none"><li>• The cost of putting in new, much larger electrical panels, wiring, reinforcing load bearing structures to handle additional weight, as well as hanging new drywall and painting will be extremely costly for multifamily rental housing providers, especially mom-and-pop owners who have limited financial resources.</li><li>• The County should allow a pass-through for this new mandate as it does for other capital costs. In addition, the County should also do a cost study for installation costs for making units "cooling ready".</li></ul> <p>3) UNSTABLE ELECTRICAL GRID</p> <ul style="list-style-type: none"><li>• As we have all experienced this summer with multiple blackouts, our electric grid is already overwhelmed with current electricity demand. Requiring a maximum air temperature to be achieved by air conditioning would only make the grid far less stable by adding enormous amounts of increased demand. The County should obtain concrete data from utilities to know the impact of such huge new peak demand that will be created.</li></ul> <p>4) RENTERS ELECTRICITY BILLS WILL SKYROCKET</p> <ul style="list-style-type: none"><li>• Air conditioners are appliances that require huge amounts of electricity to run along with ongoing maintenance, and installation of air conditioning units will cause huge increases in monthly utility bills for renters. This mandate will be a costly new burden for renters in buildings with metered electricity.</li></ul>



# **PUBLIC REQUEST TO ADDRESS THE BOARD OF SUPERVISORS COUNTY OF LOS ANGELES, CALIFORNIA**

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## **Correspondence Received**

		<p>• Already rent-burdened renters who struggle to pay monthly rent will incur the added costs of running their air conditioning units. Existing renters will not realize the huge financial impact of running these units until AFTER receiving their first utility bill. The County should obtain concrete data from utilities on the average cost for renters to run an air conditioning unit during the summer.</p> <p>5) ORDINANCE SHOULD BE LIMITED TO ONLY ONE HABITABLE ROOM</p> <p>• Per the LA County Code, the heating requirement is already limited to one habitable room within the unit and any new mandate should align with existing heating requirements. A kitchen under the code is one of the habitable rooms which will normally be warmer when food is cooked compared to the rest of the unit.</p>
	Philip K Taylor	<p>OPPOSE – A SINGLE 82-DEGREE INDOOR RESIDENTIAL HEAT STANDARD</p> <p>Dear Supervisor Hahn and LA County Board of Supervisors, I kindly request your leadership in opposing the 82-degree Indoor Residential Heat Standard. As climate change worsens, we need the ability to build more dense housing near public transit. Developers need to be incentivized to build new homes of all types and for all income levels near public transit. This means that we need to reduce the rules and regulations that are required of developers and landlords if we are to meet our housing goals.</p> <p>The best way to fight climate change driven heat is to build dense housing in mixed density walkable neighborhoods near public transit. This means removing regulations so that developers can build what they want where they want. A temperature standard will act to disincentivize developers from building climate-friendly homes for people who need them.</p> <p>For these reasons, I kindly urge you to vote “NAY” on the single 82-degree indoor residential heat standard.</p> <p>Please feel free to reach out to me at philiptaylor4545@gmail.com with any questions. Sincerely, Philip Taylor</p>
	Other	
	Fred Sutton	Attached, please find a letter from the California Apartment Association regarding this manner.
	Madison Jennings	I am so proud of LA County for considering climate protections for tenants. As climate change continues to cause temperatures to rise, renters health and well being will be threatened if they cannot properly cool down. I believe that establishing a maximum indoor temperature threshold for rental housing units is important, but I hope that the temperature threshold established in this ordinance can be applied to all of LA County, not only the unincorporated areas. Additionally, I believe that the amendment that limits the requirement to only one room in a unit significantly weakens the ordinance and makes it less likely to be properly upheld. The amendment should at least include a sunset date that allows for the ordinance to become the full capacity of the rental unit in the near future. Thank you for your time and consideration.



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		<b>Item Total</b>	<b>85</b>	
32.	14	<b>Favor</b>	Alex Jasset	
			Alexandra Gay	
			Anna Saucedo	
			Brittany Rivas	
			Bruce Saito	
			Catherine Baltazar	
			Chelsea Kirk	
			Daniel Hom	
			Diego Rodrigues	
			Dwight D Scott	
			Eric Farrar	
			Fernando Ochoa	
			Grace Hut	
			Guadalupe Gonzalez	
			Isabel Parada	
			Jacqueline Walukas	
			Jannet A Torres	
			Karen Romero Estrada	
			Kenny Montejano	
			Laura Gracia	
			Maru Cruz Castillo	
			Mireya Aguilar	
			Morris Rocha	
			Rene Jimenez	
			Ryan Sanchez Gonzalez	
			Sergio Lopez	
			Shane Henson	

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The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
32.	14	Favor	Wendy Miranda	
			Wendy Miranda	
		Oppose	Annette V Graw	
			Gina Hoskins	
			Jennette Toderick	
			Jerard D Wright	<p>GLAR wants to thank Supervisor Mitchell for her sensible and responsible motions at the cluster to provide a workable pathway to implement the ordinance. The currently written ordinance has many questions than answers with respect to how to make this work for housing providers. In addition their is a question of liability for when a tenant brings a window slung AC unit and that AC unit falls on the property, who is liable for any harm and injury the falling of the AC unit? The ordinance leaves this wide open to interpretation which is a major concern to housing providers.</p> <p>Here are 5 other points that we have concerns with this ordinance with respect to its implementation.</p> <p>1) 86 DEGREES IS A CONSISTENT MEASURE BASED ON STATE HEALTH REGULATIONS</p> <ul style="list-style-type: none"><li>• The California Department of Industrial Relations set an indoor maximum temperature of 86 degrees Fahrenheit in June 2024 for all workplaces. There is no legitimate "health" reason that a residence should be cooler than an average workplace.</li><li>• Even regulations for "Residential Care Facilities for the Chronically Ill" allow temperatures up to 86 degrees. We need a maximum temperature of 86 degrees Fahrenheit to allow for more environmentally sensitive solutions such as evaporator coolers in most areas and in alignment with existing California laws.</li></ul> <p>2) HIGH CAPITAL COSTS WITH NO PASS THROUGH TO TENANTS</p> <ul style="list-style-type: none"><li>• The cost of putting in new, much larger electrical panels, wiring, reinforcing load bearing structures to handle additional weight, as well as hanging new drywall and painting will be extremely costly for multifamily rental housing providers, especially mom-and-pop owners who have limited financial resources.</li><li>• The County should allow a pass-through for this new mandate as it does for other capital costs. In addition, the County should also do a cost study for installation costs for making units "cooling ready".</li></ul> <p>3) UNSTABLE ELECTRICAL GRID</p> <ul style="list-style-type: none"><li>• As we have all experienced this summer with multiple blackouts, our electric grid is already overwhelmed with current electricity demand. Requiring a</li></ul>

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				<p>maximum air temperature to be achieved by air conditioning would only make the grid far less stable by adding enormous amounts of increased demand. The County should obtain concrete data from utilities to know the impact of such huge new peak demand that will be created.</p> <p>4) RENTERS ELECTRICITY BILLS WILL SKYROCKET</p> <ul style="list-style-type: none"><li>• Air conditioners are appliances that require huge amounts of electricity to run along with ongoing maintenance, and installation of air conditioning units will cause huge increases in monthly utility bills for renters. This mandate will be a costly new burden for renters in buildings with metered electricity.</li><li>• Already rent-burdened renters who struggle to pay monthly rent will incur the added costs of running their air conditioning units. Existing renters will not realize the huge financial impact of running these units until AFTER receiving their first utility bill. The County should obtain concrete data from utilities on the average cost for renters to run an air conditioning unit during the summer.</li></ul> <p>5) ORDINANCE SHOULD BE LIMITED TO ONLY ONE HABITABLE ROOM</p> <ul style="list-style-type: none"><li>• Per the LA County Code, the heating requirement is already limited to one habitable room within the unit and any new mandate should align with existing heating requirements. A kitchen under the code is one of the habitable rooms which will normally be warmer when food is cooked compared to the rest of the unit.</li></ul>
		Item Total	33	
Grand Total			118	

## **Balancing Tenant Safety and Housing Sustainability: A Practical Implementation Framework for LA County's Indoor Temperature Ordinance**

Prepared for: Supervisors:

Holly J. Mitchell, Hilda Solis, Lindsey Horvath, Janice Hahn and Kathryn Barger

Date: August 1, 2025

### **INTRODUCTION: A SHARED GOAL**

We all share the same objective: protecting tenants from extreme heat in a way that is safe, sustainable, and equitable. Landlords are fully committed to providing effective cooling in our buildings, particularly in areas where tenants are at highest risk.

But to do this right, cooling must be implemented in a way that reflects the structural integrity and real-world constraints of Los Angeles County's diverse and aging housing stock. This is not a work-around to avoid investing in tenant well-being. On the contrary: we want to ensure that investments are made wisely, safely, and in ways that actually deliver results for the people who need them most.

We want the ordinance to work the first time—without years of legal wrangling, tenant displacement, or failed retrofits. That means designing a policy that is grounded in practical realities, so that enforcement is clear, the compliance path is achievable, and the outcome is meaningful. The goal must be a cooling standard that is enforceable, not performative—and that uplifts tenants without breaking the housing system they depend on.

### **TECHNICAL REALITIES OF RETROFITTING**

Los Angeles County has approximately 1 million housing units—an estimated 90% of which were built before 1990. These buildings were never designed to handle the electrical demands of modern air conditioning. Most still rely on original wiring, undersized panels, and outdated infrastructure.

This isn't about installing a \$300 window unit. For most apartments, meeting the proposed temperature standard would require full-scale electrical overhauls: rewiring, panel upgrades, new in-unit circuits, utility coordination, and HVAC installation. These upgrades are not only expensive—they are deeply invasive. In many cases, they require cutting into walls, ceilings, and decades-old stucco exteriors that were never intended to be disturbed. What may seem like a straightforward retrofit often becomes a full-scale reconstruction project, with ripple effects across tenant safety, building integrity, and environmental compliance.

**Even more concerning is the rush to pass this ordinance without conducting a comprehensive feasibility study.** A basic analysis of the County's aging housing stock, multiplied by the number of required retrofits, reveals a staggering economic burden—

likely in the billions of dollars. Yet this ordinance is advancing without a formal assessment of cost, infrastructure capacity, or market impact.

Asking property owners to shoulder billions in mandatory upgrades—without even studying the implications—is not fiscally responsible. Many landlords will be unable to afford these improvements. Some will lose their properties; others will be forced to take on significant debt, jeopardizing their financial security for years. With such high capital outlays, there may be no return on investment for decades, and no funds left for regular maintenance, capital improvements, or tenant services. This applies to landlords of all sizes – mom and pop, but even medium and larger scale.

Even if funding weren't an issue, the implementation challenge remains enormous. Retrofitting hundreds of thousands of units would require:

- **Multi-billion-dollar capital outlays**
- **New transformers for many buildings** (often at owner expense), costing \$50,000–\$250,000 each
- **Years-long backlogs** due to utility delays and a shortage of licensed electricians
- **Environmental abatement** in pre-1980s buildings with lead paint, asbestos, or hazardous stucco
- **Tenant relocation** in cases where upgrades cannot be safely completed with occupants in place

Simply put: the infrastructure doesn't exist today to support the proposed mandate at scale. Without a realistic compliance strategy and a formal feasibility study, the County risks enacting a policy that is both **unenforceable and destabilizing**.

#### **PERMITTING & INSPECTION CAPACITY: A TEST OF GOOD GOVERNANCE**

Any policy of this scale must be grounded in operational reality. Requiring cooling retrofits across Los Angeles County could trigger hundreds of thousands of permit applications and millions of inspections—from plan checks and environmental clearances to post installation verification. Yet no feasibility study has been conducted to determine whether local permitting agencies have the capacity to process this volume. This omission raises serious questions about whether the County is prepared to administer the ordinance effectively—or fairly.

We've already seen the system strain under far smaller demands. After the devastating wildfires earlier this year, over 18,000 structures were damaged or destroyed. Yet as of mid-2025, only a fraction of rebuild permits have been approved, despite emergency orders and CEQA waivers. If rebuilding from wildfires has exposed significant delays, what happens when every aging apartment building in LA County requires retrofitting?

#### **CLARITY TO AVOID LITIGATION**

Ambiguity in law leads to confusion in the field—and lawsuits in the courtroom. The ordinance’s current language, requiring all “habitable rooms” to stay below 82 degrees, lacks clear definitions or enforcement standards. This opens the door to endless legal disputes over what qualifies as a room, how temperatures are measured, and whether momentary fluctuations count as violations. In an already litigious housing environment, this will only add fuel. Insurance carriers are already pulling back from older multifamily buildings due to habitability claims, and a vague cooling mandate could accelerate that trend, increasing costs and reducing access to coverage.

A well-written policy should reduce risk, not multiply it. To avoid a wave of lawsuits and overcorrection, the ordinance should define compliance based on the primary living area, specify measurement standards, allow for reasonable temperature variance, and offer safe harbor protections for landlords who provide at least one compliant cooling device. Clear, objective rules will support consistent enforcement, limit legal exposure, and give both landlords and tenants a workable path forward.

### **Targeted Compliance Through Heat Mapping and Main-Living-Space Standards**

Los Angeles County’s Heat Vulnerability Map is a powerful tool that allows for targeted, equitable implementation of the indoor temperature ordinance. A blanket requirement—mandating compliance in every unit, in every ZIP code—is not only inefficient but also counterproductive, diverting limited resources away from tenants who face the greatest risk.

We propose a tiered compliance model based on heat exposure, infrastructure limitations, and population vulnerability:

- High-vulnerability zones—such as the San Fernando Valley, East LA, and inland communities—should be required to meet the ordinance in the main living area, where residents spend most of their time and cooling has the highest impact on health outcomes. These areas experience more extreme temperatures, fewer green spaces, and house higher concentrations of elderly and low-income tenants.
- Moderate zones—including parts of the San Gabriel Valley or hillside neighborhoods—may be subject to a relaxed threshold, such as 86 degrees in one room.
- Low-risk zones, like coastal communities, should be exempt or deprioritized.

Many of these areas experience fewer than 10 days per year above 82 degrees, often with evening cooling and lower indoor heat retention.

**Most importantly, RAND’s research supports limiting the compliance requirement to a single cooled room—specifically the main living area.** This approach maximizes health benefits while reducing infrastructure strain, environmental exposure, and implementation delays.

If the goal is to protect lives, focus where the risk is highest. If the goal is governance that

works, adopt a data-driven, room-specific, heat-map-based compliance strategy that aligns with public health outcomes and logistical realities.

## **CONCLUSION**

Despite the sweeping nature of this ordinance, it the County has not conducted a comprehensive feasibility study to assess its technical, financial, and administrative implications. Nor does it seem that the County has meaningfully solicited or incorporated feedback from housing providers—one of the largest and most affected stakeholder groups. Without adequate landlord engagement, the policy risks becoming both overbroad and underinformed, increasing the likelihood of unintended consequences, legal challenges, and administrative gridlock.

LA County has a chance to lead the nation in implementing a fair, data-driven, and enforceable tenant protection policy that enhances resilience without damaging the rental housing ecosystem. Good governance demands that policies be clearly written, economically sensible, environmentally responsible, and administratively feasible.