

Communication from Public

Name: Catherine Baltazar

Date Submitted: 02/17/2026 08:54 AM

Council File No: 25-1036

Comments for Public Posting: RE: Support for the Maximum Indoor Temperature Motion, Council File No. 25-1036 Agenda Item 12 Dear Los Angeles City Council Members, Thank you for the opportunity to support the opportunity for the City to opt-in to LA County's Safe Indoor Temperature Standard for rental housing. We appreciate the Council's commitment to a smooth implementation. However, we are concerned that the directive recently added, requiring LADWP to conduct a 'thorough grid analysis' prior to adopting an ordinance, may introduce unforeseen delays and complexity into the process. Climate Resolve is a Los Angeles-based nonprofit organization dedicated to advancing equitable, community-centered climate solutions that protect Angelenos from the intensifying impacts of extreme heat. For more than a decade, our organization has played a leading role in shaping extreme heat policy at the local and statewide levels. Climate Resolve supported the passage of LA County's Safe Indoor Temperature Ordinance; co-designed the statewide Extreme Heat and Community Resilience Grant Program; and played a central role in advocating for California's updated Extreme Heat Action Plan. Most recently, we partnered with the Office of Environmental Health Hazard Assessment (OEHHA) to co-design the state's new heat-ranking tool, CalHeatScore — an innovative system that helps Californians understand their risk during dangerous heat events and take lifesaving actions to stay safe. Los Angeles already possesses robust grid modeling through the LADWP's LA100 and LA100 Equity Strategies studies, which extensively cover future cooling needs and grid capacity. Supported by the National Renewable Energy Laboratory, this comprehensive existing body of work should be relied upon, making a new, undefined analysis unnecessary. Extreme indoor heat is a documented public health emergency linked to serious and potentially fatal health impacts for vulnerable residents. The urgency of this issue is underscored by Los Angeles County, which has already adopted its Safe Indoor Temperature Ordinance with full enforcement set for 2027. In the meantime, delaying tenant protections has life-or-death implications. Extreme indoor heat has been linked to respiratory distress, cardiovascular strain, heat exhaustion, insomnia, kidney stress, and other serious health impacts. For seniors, infants, people with disabilities, and

medically vulnerable residents, prolonged exposure to indoor heat can be fatal. The urgency is well-documented: Los Angeles County has already acted by adopting a maximum indoor temperature standard, with implementation beginning in 2027. That timeline was intentionally designed to give property owners adequate time to prepare while ensuring tenants receive meaningful and enforceable protection. The City of Los Angeles should align with the County and provide consistent protections to the renters who make up nearly two-thirds of city households. The proposed ordinance allows for a mix of passive and active cooling strategies, many of which place minimal demand on the grid, and the motion already directs LADWP to report on existing load-reducing incentives. Extreme heat is a public health emergency, and renters deserve the same basic protection afforded to homeowners: a safe home during a heat wave. Establishing a safe indoor temperature standard is a long-overdue extension of basic habitability requirements essential for public health and safety. For these reasons, Climate Resolve respectfully urges City Council Members to vote “yes” on Agenda Item 12 and to refine the directive to LADWP so it does not delay or complicate the adoption of the Safe Indoor Temperature Standard. Aligning with the County ensures that the city of Los Angeles acts with clarity, consistency, and urgency in protecting residents from one of the most immediate climate threats we face. Thank you for your ongoing leadership, and for your commitment to advancing a safer, healthier, and more climate-resilient Los Angeles. Climate Resolve stands ready to support the City as it advances this urgently needed policy. If you would like to reach out, please contact Catherine Baltazar, Associate Director, Advocacy & Organizing at cbaltazar@climateresolve.org.



Innovate. Advocate. Achieve. **Together.**

February 17, 2026

Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012
Sent via: cityclerk.lacity.org

**RE: Support for the Maximum Indoor Temperature Motion, Council File No. 25-1036
Agenda Item 12**

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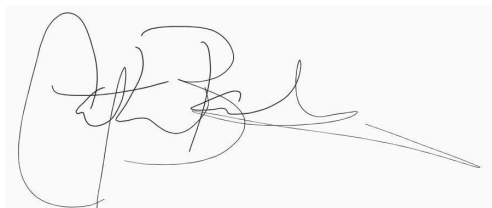
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Sincerely,



Catherine Baltazar
Associate Director, Advocacy & Organizing

Communication from Public

Name: Janet Gagnon
Date Submitted: 02/17/2026 07:44 AM
Council File No: 25-1036
Comments for Public Posting: Apartment Association of Greater Los Angeles formal comment letter regarding Indoor Air Temperature Threshold (a/k/a Cooling Retrofit Mandate), agenda item 12 (see attached).



AAGLA

“Great Apartments Start Here!”

Janet M. Gagnon
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Affairs & External Relations
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213.384.4131; Ext. 309

February 17, 2026
Via Electronic Mail

Honorable President Marqueece Harris-Dawson
and the Members of the Los Angeles City Council
John Ferraro Council Chamber
Room 340, City Hall
200 North Spring Street
Los Angeles, California 90012

Re: Indoor Air Temperature Threshold (a/k/a Cooling Retrofit Mandate) – Agenda Item 12

Honorable President Harris-Dawson and Members of the Los Angeles City Council:

The Apartment Association of Greater Los Angeles (AAGLA) represents approximately 10,000 rental housing providers, including many in Los Angeles. More than 80% of our members are mom-and-pop owners with 20 or fewer units, including a large majority with properties under the City’s Rent Stabilization Ordinance (RSO).

The air temperature threshold ultimately adopted will dictate the types of technology solutions necessary to meet the threshold and ultimately the necessary costs of devices and building upgrades. A threshold set at 82 degrees is completely arbitrary and has no basis in science and it is tied to a single Canadian “study” conducted by Robert D. Meade and others involving only **16 participants** (<https://cdnsicencepub.com/doi/abs/10.1139/apnm-2023-0361>). This clearly is not a statistically significant sample size necessary to establish valid scientific evidence nor has it been repeated to confirm its prior outcome. All other studies have concluded that an indoor air temperature of 86 degrees is safe. **In fact, California regulations for “Residential Care Facilities for the Chronically Ill” allow maximum indoor air temperatures up to 85 degrees.** Further, the original report from Los Angeles County’s Department of Public Health (LADPH) dated April 26, 2023 recommended an indoor maximum temperature threshold of 82 degrees for air conditioning AND 86 degrees for evaporator coolers.

Many other cities with far higher normal climate temperatures have dual thresholds depending on available cooling technologies or higher single maximum air temperatures thresholds to allow for flexibility on types of cooling technologies utilized (see chart below).

City	Temperature Threshold
Phoenix, Arizona	82° air conditioning & 86° evaporator coolers
Tempe, Arizona	82° air conditioning & 86° evaporator coolers



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Tucson, Arizona	82° air conditioning & 86° evaporator coolers
Clark County, Nevada	85° all technologies
El Paso, Texas	90° all technologies

As the letter written by several environmental groups states there are many other active cooling technologies that are far more environmentally friendly than air conditioning and far less expensive for renters to utilize and for owners to prepare for installation. Below are some key characteristics to consider in determining an indoor air temperature threshold.

Air Conditioning	Heat Pump	Evaporator Cooler
Electrical Usage = 100%	Electrical Usage compared to AC = 30-40% LESS	Electrical Usage compared to AC = 66% LESS
Environmentally Damaging Refrigerant	Environmentally Damaging Refrigerant	NO Refrigerant
Increases Climate Change By Creating Heat Islands Outside	Increases Climate Change By Creating Heat Islands Outside	NO Heat Islands as cools existing air rather than “exchanging” it.
Cost Per Device Only = \$7,000-\$8,000 (Duplex only) Window AC = \$300+	Cost Per Device Only = \$8,000 – \$9,000 (Duplex only)	Cost Per Device = \$100+
PLUS Installation Ready Costs of: New Electrical Panel, Wiring, Patching, Painting, Structural/Framing, and Roofing (depending on location).	PLUS Installation Ready Costs of: New Electrical Panel, Wiring, Patching, Painting, Structural/Framing, Roofing (depending on location).	NO Installation Ready Costs as device is completely inside the home and requires far less electricity to use.
NOT Portable	NOT Portable	Portable, so can be taken from room-to-room as needed

There are also many other passive cooling technologies, such as tree canopies, solar shades, and blackout curtains. However, such passive technologies cannot typically provide as much cooling as active technologies especially in high heat areas such as the San Fernando Valley.

A key factor for cooling technology is the installation cost, especially for RSO properties that cannot raise rents to cover this new cooling retrofit cost. The specific issue of installation cost was supposed to have been answered by two cost studies to be conducted by LAHD, one on central air conditioning and one on wall air conditioning, per the unanimous vote of the City Council on June 2, 2023, File Number 23-0453. However, **LAHD has failed to complete these costs studies and provide their results.**

Another key factor is the cost for a renter to use the technology. Electrical rates are expensive and ever increasing. Renters already struggling with making ends meet cannot afford a huge increase in their electricity bills due to using air conditioning units that use massive amounts of electricity during peak demand periods over the summer. **A cooling device that is too expensive to run, cannot cool anyone.** A

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handful of rebates is not enough to help the majority of renters to receive cooling by running an air conditioner to achieve an artificially low maximum indoor air temperature threshold. A maximum indoor air temperature threshold must be set at a temperature that is achievable by a wide variety of technologies that renters can afford to use.

Thank you for your time and consideration. Please feel free to reach out to me directly by telephone at (213) 384-4131; Ext. 309 or via electronic mail at janet@aagla.org.

Sincerely,

Janet M. Gagnon

Janet M. Gagnon, Esq.

CC: Daniel Yukelson, Executive Director, Apartment Association of Greater Los Angeles