

Communication from Public

Name: Environmental Advocates

Date Submitted: 02/09/2026 09:39 AM

Council File No: 25-1036

Comments for Public Posting: The undersigned organizations are writing to voice our strong support for the Maximum Indoor Temperature motion in order to protect tenants from extreme indoor heat. We encourage Council to use this opportunity to also direct staff to bring back options to adopt the 2025 CALGreen Air Conditioner Replacements (AC to HP) building code, which will support the adoption of high efficiency heat pumps instead of air conditioners, which can provide both climate-friendly heating and cooling. Many organizations submitted a letter in support of these codes last August. We also want to reiterate our concerns about the amendment made to the motion by the Housing and Homelessness Committee, which directs Los Angeles Department of Water and Power (LADWP) to conduct “a thorough grid analysis” before adoption of an ordinance. This analysis is duplicative and unnecessary, and will only delay this life-saving policy from being adopted. Find the full comment letter attached. Kim Orbe Senior Conservation Program Manager Sierra Club, Angeles Chapter Matthew Vespa Senior Attorney Earthjustice Ben Stapleton CEO USGBC California Emely Garcia SoCal Legislative Advocate National Resource Defense Council Serena Pelka Senior Policy Advocate Climate Action Campaign Sean Armstrong Managing Principal Redwood Energy Kelly Lyndon Co-Chair San Diego Building Electrification Coalition



SIERRA CLUB
ANGELES CHAPTER



EARTHJUSTICE



February 9, 2026

Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Subject: Support for the Maximum Indoor Temperature Motion and to explore AC to Heat Pump Code Adoption, Council File No. 25-1036

The undersigned organizations are writing to voice our strong support for the Maximum Indoor Temperature motion in order to protect tenants from extreme indoor heat. We encourage Council to use this opportunity to also direct staff to bring back options to adopt the 2025 CALGreen Air Conditioner Replacements (AC to HP) building code, which will support the adoption of high efficiency heat pumps instead of air conditioners, which can provide both climate-friendly heating and cooling. Many organizations submitted a letter in support of these codes last August.¹

We also want to reiterate our concerns about the amendment made to the motion by the Housing and Homelessness Committee, which directs Los Angeles Department of Water and Power (LADWP) to conduct “a thorough grid analysis” before adoption of an ordinance. This analysis is duplicative and unnecessary, and will only delay this life-saving policy from being adopted.

Need for Maximum Indoor Temperature Requirements:

A significant portion of Southern California households currently lack access to air conditioning, leaving them vulnerable during increasingly frequent heat waves. Nearly 1 in 7 households in Southern California Edison's territory, and 1 in 5 households in LADWP's service area have no

¹ Sierra Club et al, *Letter to Los Angeles City Council Supporting AC to HP Reach Code*, (August 2025), [link](#).

cooling systems.² The proposed Maximum Indoor Temperature policy will ensure that tenants are provided life-saving cooling resources, while providing flexibility for landlords and avoiding proscriptive options. As the climate crisis worsens and extreme heat events become more common in Los Angeles, expanding access to cooling for tenants is critical, and will save lives.

Benefits of the AC to Heat Pump Reach Code

As the proposed Maximum Indoor Temperature policy would encourage the installation of mechanical cooling in rental housing, pairing it with an AC to HP code would ensure that only high efficiency heat pumps were being installed, reducing emissions and saving households money.

The model AC to Heat Pump code encourages ducted air conditioning (AC) replacements and new installments in single-family homes be replaced with high efficiency heat pumps in order to reduce climate pollution and lower energy costs. The code is in line with the Sustainable City pLAN and Los Angeles Green New Deal goals to reach net zero carbon emissions for new buildings by 2030, and existing buildings by 2050, and to dramatically reduce building energy use.³

Already, cities across the State have adopted AC to HP codes, including Southern California Cities Moreno Valley and Glendale, with many more in the process of adoption.⁴ Beyond reducing emissions and increasing energy efficiency, building electrification policies can save Los Angeles residents money, reduce harmful air pollution, and expand access to much-needed cooling in the face of increasing climate-driven extreme heat events, like Los Angeles experienced just last summer.

AC to HP policies not only incentivize more efficient alternatives to conventional air conditioning units, they also help to offset or completely eliminate the future use and replacement of fossil fuel-powered furnaces due to heat pumps' ability to both heat and cool homes. And unlike most furnaces on the market, which are powered by fossil fuels like methane gas, propane, and oil, heat pumps are electrically powered. This means that heat pumps do not burn dirty fuels inside homes to be breathed in or released into the atmosphere.

The South Coast Air Quality Management District 'Go Zero' Program continues to demonstrate consumer desires for cooling and transitioning to clean equipment like heat pumps. At the January Stationary Source Committee meeting, staff gave a presentation and update on the overwhelming success of this program, specifically in LA County. Of 2,000 single-family rebates issued or being processed via Go Zero in all four counties (LA, Orange, Riverside and San Bernardino), 1,200 of those have benefited LA County.⁵ There is an overwhelming number of

² LADWP, *LA 100 Equity Strategies*, (November 2023) [link](#).

³ City of Los Angeles, *Green New Deal Plan*, [link](#).

⁴ Local Building Codes and Standards, *2025 Code Cycle Locally Adopted Energy Ordinances*, [link](#).

⁵ South Coast Air Quality Management District, *Stationary Source Committee Meeting Minutes*, pages 16-21, (January 23, 2026) [link](#).

rebates and incentives from this program also going to multi-family properties in the greater LA area.⁶

For the average US home, installing electric heat pumps in place of a gas furnace and gas water heater would reduce heating greenhouse gas (GHG) emissions more than 45 percent over the next 10 years.⁷ In Los Angeles, these savings will be even higher due to the Los Angeles Department of Water and Power's (LADWP) commitments to reduce emissions from its electricity by 71.6% by 2030.⁸

In addition to the associated GHG reductions with heat pump adoption, replacing fossil fuel appliances with heat pumps also eliminates harmful indoor and outdoor NOx pollution as well. Los Angeles has some of the most polluted air in the country. Nationally and within the LA basin, outdoor air pollution disproportionately impacts low-income and Black, Indigenous and People of Color (BIPOC) communities, as these groups are disproportionately exposed to ozone (also known as smog) and other criteria pollutants such as NOx, PM2.5, and CO.⁹ By adopting AC2HP policy, Los Angeles would take meaningful steps to reduce this pollution, and ensure clean air for all.

Requirement for Grid Analysis is Unnecessary and Will Delay Lifesaving Measures

Many of our organizations have worked with LADWP and given feedback to the extensive models for load growth scenarios, primarily through the LA 100 Equity Strategies study, as grid reliability and electrification of all sectors are needed.¹⁰ We urge the City to instead ask LADWP to present its existing plans for meeting increased demand, as these are actively in the works. Additionally, the Clean Power Alliance — LA County's local utility choice provider — has reported that demand on the grid from air conditioning will be minimal, especially because the policy allows landlords to opt for a combination of active and passive cooling strategies.¹¹

The City's proposed policy would allow landlords to opt for a combination of active and passive cooling strategies and also encourages energy-efficient cooling strategies by directing LADWP to report on existing renewable energy and energy-efficiency incentive programs. We have seen success from several of these types of incentive programs at supporting increased access to mechanical cooling, including the South Coast Quality Air District's Go Zero Incentive Program,¹² and we continue to advocate for expansion of these programs.

⁶ *id*

⁷ The Sierra Club, *New Analysis: Heat Pumps Slow Climate Change in Every Corner of the Country*, (April 2020) [link](#).

⁸ Los Angeles Department of Water and Power, *LADWP, the First Municipal Utility in North America to Establish Science Based Targets to Further its Commitment toward a Clean Energy Future*, 2023, [link](#).

⁹ Timothy Q. Donaghy et al., "Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities," *Energy Research & Social Science* 100:103104, (June 2023) [link](#).

¹⁰ *Supra* note 2

¹¹ Clean Power Alliance, Testimony to LA County, (August 5, 2025) [link](#)

¹² SCAQMD, *Go Zero Program*, [link](#)

We urge the Council to adjust the directives to LADWP, and to consider including language to direct staff to bring back options to adopt AC to HP code in order to maximize energy efficiency and climate benefits of the proposed maximum indoor temperature policy.

Signed,

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