



January 26, 2024

Los Angeles County Board of Supervisors
Honorable Supervisor Holly Mitchell - 2nd District
500 West Temple Street
Los Angeles, CA 90012

Re: Proposed 2045 Climate Action Plan (CAP) and an Impartial Economic Impact Analysis of CAP.

Dear Supervisor Mitchell,

We are writing on behalf of the Building Industry Association of Southern California and Rebuild SoCal Partnership to express our appreciation to you and your staff members Laura Muraida, Isela Gracian and Franciso Lopez for taking the time for our January 16 meeting regarding the proposed 2045 Climate Action Plan (CAP).

Moving forward, we respectfully request your assistance to help continue our dialogue by urging county planning staff to respond to our recent letters to address critical issues of concern. Also, it was noted by your staff that there has been a document previously prepared by county staff to clarify the aspirational goals of the CAP. We would appreciate receiving a copy of this document.

While we have previously requested that the county complete an economic impact study for review prior to adoption of the proposed CAP, we want to express our mutual commitment to supporting a CAP that places public health and environmental stewardship as a top priority. We share your commitment to ensure the health and welfare of all residents especially those who are the most vulnerable including working-class neighborhoods, low-income communities and communities of color across the county.

We remain optimistic that the proposed 2045 CAP can raise the bar of protecting the environment and protect the health of local residents through clearly defined aspirational goals while also ensuring the growing housing and infrastructure needs in Los Angeles County are addressed. These goals are not mutually exclusive as home builders across the Golden State continue to pursue the construction of the most energy and water efficient housing stock in the nation.

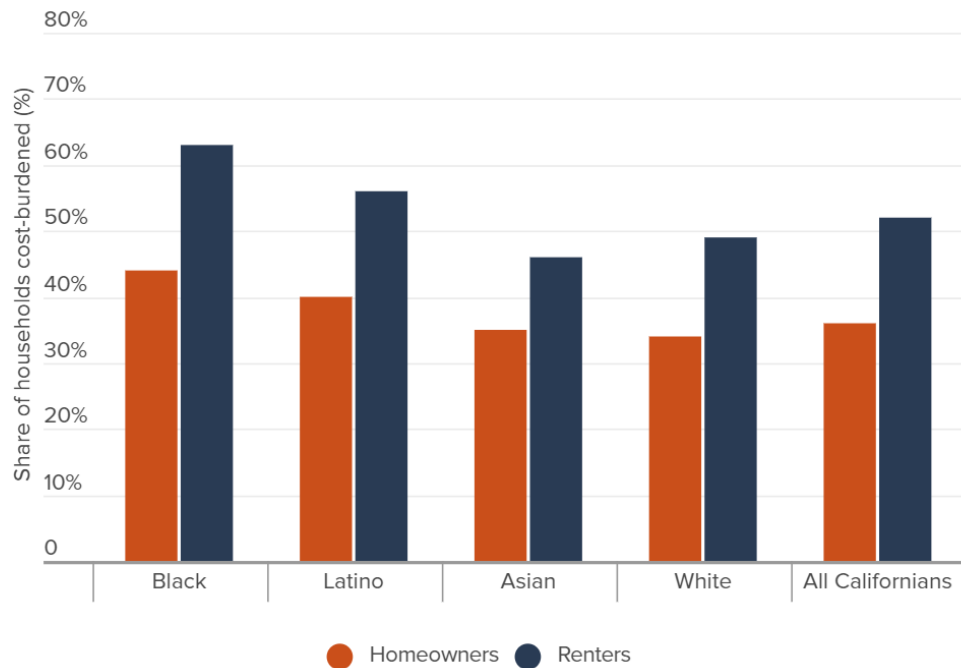
As noted by the California Energy Commission (CEC), state code requirements for new home construction reduce GHGs by using less energy. Likewise, some of the water-saving measures in the standards lead to more efficient appliances and building fixtures that buoy California's water supply and save energy by using and moving less water (see attached).

As you consider the proposed CAP, we request that you contact county planning staff and urge them to respond to our previous letters. Without addressing our numerous concerns the unintentional consequence of this CAP will result in undermining future infrastructure projects. As proposed the CAP will also result in a de facto moratorium through the increased weaponization of CEQA lawsuits enabling opponents to raise even more legal challenges. This will exacerbate the housing shortage, increase housing costs and widen the divide of income inequality in Los Angeles County.

As noted in a report by the Public Policy Institute of California (PPIC),

The housing crisis in California affects residents of all races and ethnicities, but the lack of affordable housing is particularly acute for African Americans and Latinos. In 2019, the Latino homeownership rate stood at 44.1%, or 19.2 points below that of white households. The Black homeownership rate was even more worrisome at 36.8%, or 26.4 points below the rate for white households. As housing prices continue to rise quickly in the aftermath of the pandemic, there is concern that these inequities may grow, leaving many—especially younger, lower-income, and nonwhite Californians—without the meaningful opportunity to own a home.

Black and Latino residents are more likely to spend a high share of their income on rent or mortgage



Source: US Census Bureau, American Community Survey; PPIC calculations.

Notes: Cost burden defined as spending more than 30% of income on housing payments. Shares computed using 2019 1-year ACS data for California.

From: PPIC Blog, May 2022.

As noted in our prior letters and described by many other stakeholders, the CAP includes sweeping measures governing our core infrastructure, our core economic sectors, our core resources of land and water that are already governed by other Supervisor-approved plans and policies, and our core values as well as statutory mandates such as delivering more housing as required by the Housing Element and approved projects.

We continue to be deeply discouraged by staff's unwillingness to remove infeasible CAP measures, its insistence on embedding the CAP into the County's General Plan, and its refusal to clearly explain how public and private sector projects and plans which are ineligible for the simplistic and narrow "checklist" would have to comply with each measure of the CAP under CEQA.

In conclusion, we share your commitment to public health and environmental stewardship. Unfortunately, the current CAP proposal and accompanying Program EIR fails to disclose the many inconsistencies and conflicts between the CAP and the County's infrastructure, economic, and housing goals. Additionally, the proposed CAP will result in a de facto moratorium through the increased weaponization of CEQA lawsuits enabling opponents to raise even more legal challenges. This will exacerbate the housing shortage, increase housing costs and widen the divide of income inequality in Los Angeles County.

We remain optimistic the Los Angeles County Board of Supervisor can adopt a CAP that continues to raise the bar on protecting the public health and environment without sacrificing housing affordability or future infrastructure priorities.

Please urge county planning staff to respond to our previous letters and establish a collaborative dialogue. Also, it was noted by your staff that there has been a document previously prepared by county staff to clarify the aspirational goals of the CAP. We would appreciate receiving a copy of this document for review. Thank you for your consideration and we look forward to working with you.

Sincerely,



Jeff Montejano
Chief Executive Officer
BIASC



Jon Switalski
Executive Director
Rebuild SoCal Partnership