



*"Great Apartments Start Here!"*

Janet M. Gagnon, Esq.  
Senior Manager, Government Affairs  
janet@aagla.org  
213.384.4131; Ext. 307

September 21, 2021  
**Via Electronic Mail**

Hon. Mayor Lopez-Viado and Members of the City Council  
City Hall Council Chambers  
1444 West Garvey Avenue South  
West Covina, California 91790

**Re:** Consideration of Request from Councilwoman Diaz Regarding Establishing a Rental Housing Inspection Program in the City of West Covina (Agenda Item 10)

---

Hon. Mayor Lopez-Viado and Members of the West Covina City Council:

At the September 21<sup>st</sup> City Council meeting, the Council will consider a request regarding establishing a rental housing inspection program in the City of West Covina. The Apartment Association of Greater Los Angeles (AAGLA or Association) is opposed to the creation of a new rental housing inspection program and urges the Council to conduct outreach to key stakeholders for further discussion and development of alternative solutions.

The Apartment Association of Greater Los Angeles, established in 1917, is a non-profit association consisting of rental housing providers and residential property management professionals throughout the Southern California region. Today, our Association has grown to assist more than 10,000 members, each of whom own or manage over 175,000 rental housing units throughout our territory in Los Angeles, Ventura, and San Bernardino counties.

Due to the COVID-19 pandemic and the resulting eviction moratoriums for non-payment of rent, most rental housing providers have collected little, if any, rent in 18 months or longer. As a result, many are struggling to pay property taxes, insurance, mortgages, necessary maintenance, and operating costs. They have already spent most of their retirement savings and many are on the brink of bankruptcy and/or foreclosure. To add a new expensive and administratively burdensome program, such as a rental housing inspection program, to their burdens would drive more rental housing owners, especially small business "mom and pop" owners, out of the rental housing business. As a result, West Covina could lose important, affordable rental housing.

The City of West Covina already has robust building, health and safety laws that are being enforced by its code enforcement staff. Creating new rules and procedures will only cause more confusion and exponentially increase administrative costs for the City and rental housing providers that will ultimately be passed on to renters. Creating a new rental housing inspection program will require the City to incur substantial upfront costs of hiring consultants to create the program structure, conducting studies to identify rental properties, purchasing new computer systems (equipment and software), and hiring many more code enforcement staff with accompanying health insurance and pension benefits.



***"Great Apartments Start Here!"***

It is unclear why this program is even being considered at this time when rental housing providers and renters are struggling to make ends meet and the City of West Covina is already experiencing challenges maintaining existing services and functions. According to the Staff report, the most that can be said is that there is some "anecdotal data" making a general claim about the useful life of rental housing. However, no actual data is given on the number of properties in West Covina claimed to fall outside of such "useful life," no inventory of specific properties, no data on the number of renters impacted, and no showing of the number of complaints received to date per property. Thus, there simply are no facts to justify the City considering the possible creation of such an extensive new program.

Our Association has more than 100 years of experience in the rental housing industry. We would welcome the opportunity to share our knowledge by continuing the conversation with the Council and staff to better understand the general concerns, identify specific issues and develop cost-effective alternatives.

Thank you for your time and consideration of these matters. If you have any questions, please call me at (213) 384-4131; Ext. 307 or contact me via electronic mail at [janet@aagla.org](mailto:janet@aagla.org).

Very truly yours,

*Janet M. Gagnon*

Janet M. Gagnon