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Hi Missy,

If you could please include the below for the BoCC backup on the rental ordinance.

Dear Commissioners,

Before you continue with a rental ordinance in the county that raises energy efficiency requirements in rentals I would like you to consider the following.

Where are the studies that show a net benefit for the tenant? Where are the studies that show requirements above minimum housing standards are providing the required return on utility bill?

If the County institutes a program requiring regular inspection of rental properties, it is likely that some property owners who have in the past rented rooms, mobile homes, or other residential units will be discouraged by the additional burdens created by the program and will simply decline to lease the property to a new tenant. When such rental units are lost, the supply of housing, and particularly the housing that is most affordable to those of limited means, shrinks. Typically, when the supply of housing declines, but the demand for housing remains the same or grows, the price of available housing increases. Supply is not meeting demand, we don't need other factors further decreasing the supply of rentals, let alone affordable rentals. Shimberg Center numbers indicate Alachua County added nearly 6,300 rental units between 2000 and 2019 BUT lost units renting for \$1,000 or less. Units at or below \$1,000 fell by over 2,600 units between 2000-2019.

Financial costs might include over-time pay for current staff who are required to work additional hours, or substantial costs to employ and train additional code inspectors if existing staff cannot meet the demand for inspections. Moreover to the extent that local building officials become so overburdened with inspecting rental properties that they take longer to investigate complaints of truly dangerous situations in residential buildings that are already occupied, or other types of serious code violations, a generally applicable inspection program may hinder rather than help improve conditions in the County's worst properties.

I am very concerned that the direction of everything is still only considering the tenant's perspective. We need to find a way to hold tenants accountable and place responsibility with the correct party. The landlord does not park the tenants cars, take out the trash, daily cleaning, or controlling the noise level, but the landlord is the one that receives the points. Consider these common issues and who should be held responsible. Changing air filters, keeping air handler floor clean from human and pet hair, spills in the refrigerator that create a sticky mess that often ruin door gaskets, overstuffing a freezer or refrigerator causing the motor to work harder and break down faster. The more responsibility placed on the landlord, the more higher costs will be passed to the tenant. It is common for a landlord to have a minimum of a \$40 per hour labor plus materials for any call. Property manager's time, maintenance worker's time, service fees, and then parts.

I also want to strongly encourage the grant program for rental improvements be up and running when the increased energy efficiency requirements on rentals are put in place. This could be vital to keeping some affordable rentals. As mentioned above, some will sell to avoid any burden, but the grant will

provide a path for those that want to remain a housing provider, but don't have the means to make the improvements, allows improvements without having to raise rent, and incentivizes affordable housing as an investment.

We all know how hard it is to gain affordable housing inventory which includes affordable rentals. This is why it is vital we don't lose any further rentals. We are seeing the affordable rental stock further decline since the city has instituted their increase in energy efficiency standards in rentals.

You've seen and heard about the issues the city has gone through. What is the rush now to enact? I would suggest you still create the grant program though. The grant program is a great way to incentivize and keep affordable rentals when we need inventory.

As you know the City has removed the requirement for the self-inspection checklist. I would recommend the same for the county program; however, here are my concerns with the city's self-inspection checklist.

1. Foundation in sound condition- what does sound mean? How will that be judged?
2. Exterior walls are free from damage? Does a nail hole count as damage? Where is the line? Will all inspectors have the same line?
3. Roof is in good repair- What does that mean? Where is the line? Will all inspectors have the same line?
4. Exterior stairs, porches, and balconies are in good repair- What does that mean? Where is the line? Will all inspectors have the same line?
5. Exterior doors are weather tight and able to be locked- How will this be determined?
6. Windows are in good working order and free from damage- Not all windows need to be openable. What does that mean? Where is the line? Will all inspectors have the same line? Think of common slotted jalousie windows, many of those no longer operate as efficiently, how will those be judged? Replacing a window is very costly
7. Lawns are maintained- What does that mean? Where is the line? Will all inspectors have the same line?
8. Walls are free of holes and cracks- What about nail holes? What does that mean? Where is the line? Will all inspectors have the same line?
9. Windows open as designed and lock closed- Codes does not require currently that all windows open. Why is this different for rentals?
10. Stove hood system in place and functioning- Some older homes didn't even have hoods.
11. Refrigerator is a minimum of 5 cubic feet and working properly- What does that mean? Where is the line? Will all inspectors have the same line? Need way more specifics.
12. Floors and walls intact and water-resistant- What does this mean, no drywall in bathrooms?
13. Vanity is sound condition- What does that mean? Where is the line? Will all inspectors have the same line?
14. All electrical systems are in sound condition with no exposed wiring- What does that mean? Where is the line? Will all inspectors have the same line?
15. Electrical panel labeled clearly and of at least 100 AMPs- Almost no panels are all labeled correctly. How will this be tested?
16. Property is free from insect infestation- How will cause be determined? Is mandatory inspection expected to take place while vacant? Most units are vacant for less than a day.
17. Fire extinguishers provided in the kitchen- Currently only in multifamily units. Additional costs that will be passed to tenant (yearly inspection of the extinguisher and replacement once expired)

18. Attic insulation minimum of R-19, except where there is insufficient space or the presence of attic flooring will not allow- What is insufficient space?
19. All accessible duct joints sealed and all ducts insulated- How will this be inspected?
20. All showerheads with a 3.0 gal/min flow rate or less- How will this be tested? Does this have the amount of options that tenants desire?
21. All faucets aerators with a 2.5 gal/min flow rate or less- How will this be tested? Does this have the amount of options that tenants desire?
22. All water lines not in enclosed space must be insulated- All older homes on pillars will need to have this done.
23. Properly maintained refrigerator with door seal/gasket intact and clean coils- What does that mean? Where is the line? Will all inspectors have the same line? Again, cleanliness is most often a responsibility of the tenant per lease agreement.
24. Programmable thermostat connected to main HVAC system- Is this even viable with all older units?
25. Duct leakage minimum standards- What does that mean? Where is the line? Will all inspectors have the same line?
26. Toilets are required to be 3 gal/flush or less at implementation of ordinance. After, 5 years, toilets must be 1.6 gal/flush or less- replacing toilets is not inexpensive. Even if have adapter are you sure they are universal for all toilets? Same for faucet requirements.

Thanks and stay safe,

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