

Communication from Public

Name:

Date Submitted: 04/21/2020 10:46 AM

Council File No: 20-0407

Comments for Public Posting: Edgewood Properties 720 North Spaulding Ave. LA 90046 Dear Council Members, My wife and I are property owners with a small six unit rental business. The covid pandemic has already encouraged several tenants to avoid or stall rent payments which are our sole source of income. Further State and local landlord restrictions are a hardship to us as small business owners. We feel that the upcoming .issues 37-38-39-68 are further stumbling blocks to our survival. Please consider our position and do not implement these further unfair burdens. We have been proud residents of Los Angeles since 1958. Sincerely, Neil and Patricia Seidel

Communication from Public

Name: Dyanne Cano

Date Submitted: 04/21/2020 11:13 AM

Council File No: 20-0407

Comments for Public Posting: I am full support of the proposed Rent Increase Freeze / Residential Rental Units / Rent Stabilization Ordinance (RSO) Units / Non-RSO Units / COVID-19 Pandemic / Ordinances. It is important and necessary to support all tenants in the city of Los Angeles right now, and the last thing we need people to worry about is if their rent will increase during this pandemic.

Communication from Public

Name: Heather M Booth

Date Submitted: 04/21/2020 11:03 AM

Council File No: 20-0407

Comments for Public Posting: I strongly support this motion to freeze rents in the city of Los Angeles. Any attempt to raise ANY rents at a time when the majority of Angelenos find themselves unemployed through no fault of their own and are forced to stay home for public health is a craven and despicable act that should frankly be punishable. A rent freeze is the least we should expect as a bare minimum protection by the city council. Rent cancellation is what is truly necessary.

Communication from Public

Name: John Short

Date Submitted: 04/21/2020 11:30 AM

Council File No: 20-0407

Comments for Public Posting: I am asking the council to PLEASE vote against items 37, 38 and 39. I have owned units in San Pedro for 43 years and I always have kept my property clean and very livable, and have always treated my tenants in a fair and equitable manner. However these motions before you today could conceivably cause me harm that I may not be able to recover from.

Communication from Public

Name: Ms. Foster

Date Submitted: 04/21/2020 12:08 PM

Council File No: 20-0407

Comments for Public Posting: See attached Memorandum regarding Agenda Item 20-0407

MEMORANDUM

TO: Los Angeles City Council Members & Mayor Garcetti
FROM: Ms. Foster; Guest House Management
RE: Agenda Item No. 20-0407; List #37
“freezing rent increases”
DATE: April 20, 2020

Using this crisis as a means to circumvent the law and rob landlords of the few legal rights guaranteed under the RSO is shameful.

Allegedly you couldn't remove or delay the requirement to pay Property Taxes because it's the law. But here, where it is also the law that landlords are guaranteed a floor of a 3% annual rent increase, you want to circumvent the law and backdoor an agenda to stick it to landlords and make us pay the price for your failure to solve a housing problem that existed prior to yet another crisis that we didn't cause.

You can't keep blaming landlords and holding them responsible for the problems in society that you fail to resolve because you're listening to the wrong people for solutions.

Los Angeles already has some of the most restrictive rent controls laws in the nation and there's no need to go any further less you have me working solely to take care of other people.

Landlords have to put in their rent increases during a designated month and year because if we don't, it is forever lost. The strict RSO bans a landlord from retroactively claiming a rent increase that was not previously claimed in a prior month or year.

The money will forever be lost and when everyone else is recovering and bouncing back from this horrible experience, we'll be stuck with the consequences of your unlawful actions which is likely what you really want and which I don't understand.

You let DWP do what ever they want; even now; without review and to the point where even when I sit in the house in the dark using no electricity, I'm still paying out more than I should as they circumvent the law and backdoor a tax to consumers calling it an “access charge”. So I have pay a just in case fee for electricity being available even if I don't use it. That's something you'd never let a landlord do and there would be hell to pay if we tried.

We are unreasonably stripped of every right and benefit allowed to every other business category and yet there are no safety nets, no protections and no bailouts for us. We are expected to just absorb every cost and every lost. There is not one program in existence that applies to me or my circumstances and not one agency that will fight for me against my creditors or pay any of my bills.

The only thing that a landlord has to rely on to cover the Mortgage, Building Insurance, Property Taxes, Business Taxes, Local, State and Federal Taxes, Water, Gas and Electricity Bills, Repairs and Maintenance Bills, Legal Bills and Capital Improvements like the mandated Earthquake

Retrofitting, are the collected rents. And for those subject to the RSO, the only thing that we have to offset the forever growing and annual increases of those hard costs, is the minimal annual 3% rent increase that we are mandated to receive as the trade-off to a rent control unit.

We can't be made to forgo that right. Who's going to pay the financial obligations?

Even if we don't enforce the collection of the rent increases right away, we can't be denied the right to assert an increase that we are entitled to receive and that we desperately need.

Most landlords are just everyday individuals that invested into the community; not major corporations. We're just individuals that worked hard and sacrificed to have something just like the next guy.

I don't have employees to try and keep on a payroll. When I need a plumber, I call a plumber and pay him directly so no payroll protection/bailout for me. I just have to keep paying for everything directly.

You shut down the City and immediately set out to get payroll protection for small business so that employees can still receive a source of income. You've streamlined unemployment and allowed individuals to collect an additional \$600 per week on top of the unemployment that they are already entitled to collect but you did nothing specifically for landlords who you have ordered to house people for free.

When you fought for all those protections for everyone else, you should have also secured a rent protection program for landlords so that we do not suffer at a loss to house those that need our support and those that are willfully abusing the situation to not pay valid rent that is due.

Each one of my loans is a commercial loan. It's automatic when the loan is for a property that has 5 or more units so the protections in place for a residential loan don't apply. Neither of my loans are backed by Fannie Mae or Freddie Mac; not even my home loan. It's a conventional portfolio loan that stayed with the lender for which the government has no control to order relief.

Even if they did so at some point, it is ridiculous to assert that it should be at the trade-off of forgiving rents that are due. 1 Mortgage payment cannot be traded against 5, 6, 7 or 13 rental payments. Rental payments are for more than the Mortgage. They offset all the other hard cost, including but not limited to required insurance, utilities, property taxes, business taxes, maintenance, repairs, gardeners, and the like.

Communication from Public

Name: Leslie Hope
Date Submitted: 04/21/2020 11:21 AM
Council File No: 20-0407

Comments for Public Posting: This proposal seeks to expand the current rent freeze time frame beyond what was ordered by Mayor Garcetti and would require the roll back of any rent increases that were in place as of March 4th and prohibit any new increases until 90 days after the emergency ends. The proposal also seeks to by-pass state law by expanding the scope of the rent increase freeze to rental units not subject to the City's RSO. Stop using this emergency to advance the pro- developer agenda. By forcing Mom 'n Pop owners out of business, you are handing over our properties to the developers that have been hounding us incessantly offering to buy our buildings for "all cash." "all cash" means at a deep discount. I have been given the right to raise my rents a small amount each year. I do so in July. Every year my expenses go up, not in small part because of new requirements such as earthquake reinforcement, balcony upgrades and so forth. While I have no real objection to these safety measures, they are expensive and I do need to raise my rents to keep up with my increased costs. Why not put strictures on other segments of the local economy? Why are you targeting Mom 'n Pop owners. Food is a necessity. Why are you not telling corporate grocery store owners and chain restaurants that they cannot raise their prices? With each arrest and FBI investigation I am coming to understand that you don't represent the interests of your constituents, but are all bought and paid for by the developers that are ruining our city to get a piece of the Gold Rush that is the Olympics. You have no compunction about breaking the law, as is shown in this proposed ordinance, yet keep proposing and passing new ordinances that you expect us to obey to advance the interests of your sponsors, even if they contradict long standing laws. Shame on you for taking advantage of this pandemic to push through laws that will only advance the interests of developers, put Mom 'n Pop owners out of business and ultimately decrease the supply of affordable housing. When we are forced to sell, the developer who buys our property will not be subject to rent control.

Communication from Public

Name: Ron Toews

Date Submitted: 04/21/2020 12:12 PM

Council File No: 20-0407

Comments for Public Posting: Dear Honorable Members, I own a few apartment buildings in the City of Los Angeles and I strongly oppose Items 37, 38 and 39 on the Wednesday, April 22nd City Council agenda. I realize that many of the renters in the City have lost their jobs or had their hours severely reduced and that in many cases their income has fallen dramatically. Such people are certainly in need of financial assistance to enable them to get through this very difficult time. However it is very unfair to ask property owners to shoulder so much of this burden. A more equitable approach would be to make resources available to renters that are unable to pay their rent so that they can afford to continue to pay the rent that is due. The approach of saying renters can just defer their rent will cause many landlords to be unable to pay their own obligations and will cause many of us to need to eliminate many of our own employees and reduce or eliminate planned upgrades to buildings and similar beneficial elective projects. Many property owners are already suffering financial hardship from the interruption of the April rent. Although many of my renters paid their April rent, a great many have already advised that they will not pay the May rent or months in the future so long as the City allows. In some cases it is because they are unable to, but in far more cases, they have simply decided to not pay because they say they have been told that they do not need to. The already lengthy and cumbersome eviction process for nuisance tenants, including tenants who may be conducting criminal activities at a property or are disturbing the quiet enjoyment of other residents at a property would come to a halt under the proposals. This would be a very unfortunate outcome for not only property owners who are facing a great deal of uncertainty and distress already while trying to work with other tenants but also for those other tenants who would like to live in a building free from these sorts of bad actors. Please do not further exacerbate the hardships of property owners by adopting Items 37, 38 and 39 on the Wednesday agenda. Instead, please try and fashion assistance for deserving renters that does not cause property owners to bear the entire cost of the help for renters. Rental assistance for deserving renters is a very sound idea, but it should be funded from the coffers of the City, not from the dwindling bank accounts of the property owners. Thank you for your careful consideration of this important matter.

Communication from Public

Name: Alanna Holt

Date Submitted: 04/21/2020 12:35 PM

Council File No: 20-0407

Comments for Public Posting: The economy is shrinking. The city's budget is a document of pain. How can any rent increases be feasible during this time? Please freeze rents now!

Communication from Public

Name: Danielle Leidner-Peretz
Date Submitted: 04/21/2020 01:16 PM
Council File No: 20-0407
Comments for Public Posting: Public comment for Council File 20-0407



"Great Apartments Start Here!"

Danielle Leidner-Peretz
Director, Government Affairs &
External Relations
danielle@aagla.org
213.384.4131; Ext. 309

April 21, 2020
Via Electronic Mail

Members of the Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles, California 90012

Re: Council Files 20-0407 (Agenda Item 37), 20-0409 (Agenda Item 38), and 20-0404 (Agenda Item 39)

Dear Members of the Los Angeles City Council:

On April 22, 2020, the City Council will be considering three motions related to the COVID-19 pandemic and prohibitions during the local emergency period. Throughout the pandemic, the Apartment Association of Greater Los Angeles (AAGLA) has continually urged the City Council to take a balanced approach in recognition of the detrimental impacts of COVID-19 on **both** the City's residents and rental housing providers, all of whom need support during these most difficult and uncertain times. AAGLA strongly opposes these measures and urges the City Council to focus on equitable solutions such as an emergency rental assistance program, agenda item 66, which is a direct and impactful means to assist renters and rental housing providers, and to reject measures that will cause further economic instability, the loss of already limited affordable housing and potential loan defaults and increased litigation.

- **Rent Increase Freeze - Agenda Item 37 (Council File 20-0407)**

On March 30, 2020 Mayor Garcetti issued an Executive Order instituting a rent freeze on occupied rental units subject to the City's Rent Stabilization Ordinance (RSO), which was made effective March 30th and is to continue for sixty (60) days following the conclusion of the local emergency period. The motion under consideration would expand the scope of the rent freeze retroactively to March 4th and through ninety (90) days following the end of the local emergency. Further, the motion seeks to make the rent freeze applicable to all the City's rental units, including non-RSO units.

Since April 1st, pursuant to the Mayor's Executive Order, no rent increases can be applied to occupied RSO units. Instituting the rent freeze retroactively to March 4th will place further financial and administrative burdens on rental housing providers by requiring that they issue refunds to

renters who received a legally permissible rent increase before March 30th, many of whom may now not be paying rent pursuant to the City’s eviction moratorium. Regarding applicability to the City’s non-RSO units, we do not believe that the City has the legal authority to institute such restrictions and is preempted from doing so by State law.

- **Classifying Unpaid Rent As Consumer Debt – Agenda Item 38 (Council File 20-0409)**

This motion proposes to re-classify unpaid rent as consumer debt, not subject to the unlawful detainer process. Through the temporary urgency ordinance, renters are provided with twelve (12) months following the expiration of the emergency period to repay unpaid rent due. As the pandemic continuously evolves, the duration of the emergency period is unknown and as a result the date upon which the repayment period will begin remains unclear.

During the emergency, rental housing providers, who are also experiencing financial hardships due to the pandemic, are being required to provide interest free loans to their customers for over a year. A requirement that has not been imposed on any other business. Re-classifying any deferred unpaid rent after a year as consumer debt would impede collection of such rent and raises other concerns. Unlike unsecured consumer debt, the payment of rent is based upon a mutually agreed upon lease agreement. There is also a court system specifically established to review and resolve disputes concerning unpaid rent. While the COVID-19 pandemic has necessitated government action, such action must not undermine the judicial system and the fundamental principles that are the linchpin of rental housing and the basis of lease agreements.

The proposal being advanced eliminates the most effective, legally permissible procedure to ensure repayment, compelling housing providers, who may not have received all or portions of past due deferred rent for more than a year to continue to provide housing to the renter who has failed to repay deferred rent, into civil litigation to obtain a judgment that they may never be able to collect. While the City’s urgency ordinance specifically states the ordinance does not eliminate any obligation to pay lawfully charged rent, this proposal would serve to disincentivize any renter afforded these protections from fulfilling their rent repayment obligations while simultaneously precluding the rental housing provider from initiating an otherwise legitimate unlawful detainer proceeding. This proposal will result in housing providers incurring losses, which will likely be passed on to new renters in the form of higher rents. The equitable solution is for the City to assist renters who are unable to repay deferred rent through a City funded rental assistance program, not by converting unpaid rent into consumer debt which may never be collected.

- **Prohibition on Tenancy Terminations – Agenda Item 39 (Council File 20-0404)**

Both Governor Newsom and the Judicial Council have issued orders suspending unlawful detainer actions during the emergency period and for a designated time period following the conclusion of the emergency. The motion under consideration goes beyond the intent of the Governor’s Order and the Judicial Council’s actions by prohibiting a rental housing provider from even issuing a 3-day notice to a renter who, for example, is creating a nuisance or engaging in illegal activity affecting other renters at a property. The proposal takes away a rental housing provider’s ability to address these issues as they arise and preserve future rights, by creating the

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potential of a finding that the housing provider has waived the right to seek a cure of the breach by failing to timely object. It is vital that rental housing providers be permitted to issue a notice of termination so that they can preserve their right to later commence an unlawful detainer action as warranted.

The COVID-19 pandemic has significantly affected, through no fault of their own, City residents and businesses alike. The proposals discussed herein and under consideration at the April 22nd City Council meeting will accomplish very little in effectively alleviating the financial and related hardships facing the City today and in the coming days or facilitate the economic rebound ahead.

Thank you for your time and consideration of these matters. If you have any questions, please call me at (213) 384-4131; Ext. 309 or contact me via electronic mail at danielle@aacla.org.

Very truly yours,

Danielle Leidner-Peretz

Danielle Leidner-Peretz

Communication from Public

Name: Brigid McNally

Date Submitted: 04/21/2020 12:43 PM

Council File No: 20-0407

Comments for Public Posting: An alarming percentage of Los Angeles' population is currently out of work and without a paycheck as a result of COVID-19 response. The City of Los Angeles needs an immediate stop gap measure precluding landlords from raising rent costs during this crisis. Furthermore, all rent collection should be immediately suspended from residents suffering loss of income due to the virus. This measure should be especially enforced, although not limited to, landlords who have had their mortgages suspended during the crisis. Landlords should not be profiting while renters face homelessness and destitution.

Communication from Public

Name: AmeriCorps Member
Date Submitted: 04/21/2020 12:56 PM
Council File No: 20-0407

Comments for Public Posting: I am commenting in support of 200407 The Rent Freeze motion. Many individuals such as low income people struggle with disability, finances, or circumstances that make these past months unstable and unsafe on a daily basis. Due to Covid-19, many have lost jobs that will not recover. In my case my AmeriCorps Program will not restart thus leaving me with no income and no possibility for unemployment. A relief period is essential to allow individuals peace of mind that their place of shelter is not under siege. Shelter is a key factor for survival, for the most vulnerable humans it is our responsibility to ensure that landlord income sustainability doesn't take priority over human life. Landlords deserve protections for their mortgages and should support this measure as a path to their own benefit. Evictions mean people will gather in homes that are smaller and less managed. Forcing the poorest and most vulnerable to condense in spaces where their health and mental peace is further strained. Please support this measure and add further protections for the good people of Los Angeles which did nothing to cause this plight

Communication from Public

Name: Brad Sagal

Date Submitted: 04/20/2020 11:58 PM

Council File No: 20-0407

Comments for Public Posting: My name is Brad Sagal. I am a tenant and a resident of LA since birth. I love our city. I want it to be as good a city as it can be. I support the motion. Housing is a human right. The UN Universal Declaration of Human Rights recognizes housing as a human right, and the US is a party to that declaration. In addition, the very first sentence of the Constitution talks about the "general welfare" of the people. What level of welfare do you have if you live on the concrete, or if you're paying 30, 40, or 50 percent of your income on rent? A universal rent freeze is best. Any "means-testing" that forces people to prove they're poor enough to deserve a rent freeze puts an undue burden on tenants, creates delays, and is psychologically demeaning. Why do tenants so often have to prove how poor they are to deserve help, but landlords don't have to prove they're poor enough that they need to deny that help? Housing is a human right. Operating a business is a privilege (not a right). I am a member of the Healthy LA coalition. HealthyLA.org. We are the largest coalition of labor unions, tenants unions, civic organizations, and religious organizations in the city.

Communication from Public

Name: Jim Vollmer

Date Submitted: 04/21/2020 08:35 AM

Council File No: 20-0407

Comments for Public Posting: Please reject - vote NO Item 37 (Council File 20-0407): Rent Freeze Motion – would impose a rent increase freeze on all rental units – those subject to the City’s Rent Stabilization Ordinance (RSO) and those that are not. The proposal calls for the rent increase freeze to be in effect retroactively from March 4 through 90 days following the end of the local emergency. It is important to note that a rent increase freeze has been in effect in the City of Los Angeles’ RSO units since March 30, 2020. This proposal seeks to expand the current rent freeze time frame beyond what was ordered by Mayor Garcetti and would require me to roll back any rent increases that were in place as of March 4th and prohibit any new increases until 90 days after the emergency ends. The proposal also seeks to by-pass state law by expanding the scope of the rent increase freeze to rental units not subject to the City’s RSO. Please reject - vote NO

Communication from Public

Name: Shmuel
Date Submitted: 04/21/2020 08:36 AM
Council File No: 20-0407

Comments for Public Posting: To put a blanket rent freeze into effect is unfair. The city and county are constantly raising fees and instituting proposals that significantly raise the operating costs of multifamily buildings. LAHD raised fees significantly this year. The Recycla program makes trash very expensive. Property taxes are still due. Tenants are using more water and other utilities because they are home. It is unfair to landlords (who are also residents of this city) to be required to pay all these extra costs while instituting a rent freeze. While I understand that for some tenants a rent freeze might be necessary but it should be on a case by case basis where a tenant can submit a request to have their increase temporarily suspended. But to roll back increases is unfair. For some landlords this is their only source of income and because of the pandemic, basic living costs are rising as well. You were elected to serve ALL residents of Los Angeles including landlords so please do that. Thank you

Communication from Public

Name: David Potter

Date Submitted: 04/21/2020 10:17 AM

Council File No: 20-0407

Comments for Public Posting: Los Angeles has high rents due a simple factor shortage of housing it is simple economics supply and demand. Create more housing and there will not be a shortage of housing. That will be an uphill battle in Los Angeles City what Builder or developer would enter the market right now? No one in their right mind! A rent increase freeze is not a viable option for small apartment owners. Over the last 20 years the City of Los Angeles has allowed only 3% increases per year on rent controlled units, however, City controlled costs like DWP - Electric, Sanitation, Water, & Trash - Minimum wage – (which will have gone up 25% in four years by 2021) All utility rates billed by DWP have increased and at times by more than 3% per year. Please remember that with each wage increase all associated taxes go up accordingly (i.e. workmans Comp, Unemployment Tax, Social Security tax, medicare tax, Federal Income Tax). There was also a recent increase in Los Angeles City RSO fees this year. Apartment owner's insurance rates have skyrocketed along with the County Tax Property Tax which can increase up to 2% per year which is a substantial amount of money. When the City of Los Angeles mandated single trash hauler my monthly rate went up 40%. The City Council needs to be fair and equal about this situation and allow small business owners an opportunity operate their business without government overreach. Please put a stop to this nonsense and allow apartment owners a measly 3 percent increase so they can keep their heads above water. We are drowning!

Communication from Public

Name:

Date Submitted: 04/21/2020 09:47 AM

Council File No: 20-0407

Comments for Public Posting: Re: Item 37 (Council File 20-0407): Rent Freeze Motion Dear Council: It is our belief that this would be redundant for the following reasons: Mayor Garcettie's order is already in place and is fair to all sides. There are also many protections currently in place for renter's who are unable to pay their CONTRACTED AND OWED rent. Property Managers already have in place tools that keep rents where they belong without legislation, i.e; Los Angeles RSO and for those units not under that ordinance, the free market! You have responsibility to act fairly to all of your constituents. Making it difficult for good, honest landlords who generate jobs and provide housing, to turn a profit. It has to be said that if there is no profit, there will be no landlords!

Communication from Public

Name: George

Date Submitted: 04/21/2020 09:23 AM

Council File No: 20-0407

Comments for Public Posting: Please Vote AGAINST this MOTION. It is very disturbing to see the City of Angeles enacting one resolution after another limiting my ability to manage my property and to collect reasonable rents as controlled by the RSO rules. I understand that some of my tenants do not work right now but they are getting the \$1200 from the federal government and I hear \$1000 from the county, though most of them work from home and paying their rent is not a hardship. In the meantime when you are encouraging tenants not to pay rent, and ask owners to provide free housing to the multitudes, you want me as an owner to pay all of the required expenses like paying mortgage, various expenses, insurance and maintain my income property in a safe and sanitary manner. Your previous resolutions have allowed tenants to introduce animals into their units with somehow adverse effects to some of my tenants who are allergic to pets. All your hostile actions against apartment owners, will result for lot of owners to default and loose their investments with disastrous results to the city's financial system the tax base of this city, and investments into multifamily properties in the city. Again, Please vote AGAINST this MOTION

Communication from Public

Name: Liberato DiBernardo
Date Submitted: 04/21/2020 09:25 AM
Council File No: 20-0407
Comments for Public Posting: STRONGLY OPPOSE!

Communication from Public

Name: juliet deem

Date Submitted: 04/21/2020 04:15 PM

Council File No: 20-0407

Comments for Public Posting: my income was drastically impacted by the economic crises posed by covid-19, after i was laid off in march. housing is a human right, and ownership of a rental property is not without risk. during this period of time in which my livelihood is largely impossible, i feel for those who have found themselves in even more dire straits, a community i assume is largely renters like myself. why not lend your constituents peace of mind in regards to a roof over their heads during this otherwise unpredictable and stressful time ?

Communication from Public

Name: HELENE BERNSTEIN

Date Submitted: 04/21/2020 04:10 PM

Council File No: 20-0407

Comments for Public Posting: MOTIONS: I am a landlord of two properties: A 10 unit and an 8 unit apartments. I understand the rights of my tenants at this time of extreme need not to be evicted. I personally would not do that at this time of duress. However, I use this income as my livelihood as I am a 72 year old senior citizen. I am sure your minds were in the right place by putting this into place. It seems that many are being protected. That is good. But I consider myself a small business of sorts and I need protection. What is to protect me from abuse of my property if I cannot evict for a year? It seems that this is set up for complete abuse of the protection you need to provide. On behalf of those who are small unit landlords, we too are suffering and would appreciate some protection. We will also loose our future income and a way to support ourselves. The banks again will be inundated with foreclosures that they don't need or want. Let's not go back to 2008 with all property owners loosing.

Communication from Public

Name: Rory Kendall

Date Submitted: 04/21/2020 04:03 PM

Council File No: 20-0407

Comments for Public Posting: I am opposed to item #37. There is no need to extend the current rent freeze.

Communication from Public

Name: Victoria M Russell
Date Submitted: 04/21/2020 04:01 PM
Council File No: 20-0407
Comments for Public Posting: As a property owner in the City of Los Angeles, I'm STRONGLY against this motion.

Communication from Public

Name: Sarah C

Date Submitted: 04/21/2020 03:49 PM

Council File No: 20-0407

Comments for Public Posting: Landlords need protection too. I own a duplex and live in one of the units. Do not forget those of us who are able to sustain our living and properties though our income from our tenants. I do not get any profit from my rental unit. Thank you, Sarah

Communication from Public

Name:

Date Submitted: 04/21/2020 04:54 PM

Council File No: 20-0407

Comments for Public Posting: Please support and vote yes on this motion to freeze rent as many renters incomes have diminished or become non-existent with job hours reductions and loss as a result of the Coronavirus pandemic. Many renters were left out by the previous rent freeze which applies to only RSO-covered units, and this vulnerable population needs to be protected from further rent increases at a time when everyone's income has been reduced.

Communication from Public

Name: Aileen Pelias
Date Submitted: 04/21/2020 04:53 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, aileen

Communication from Public

Name: Rebecca Strong
Date Submitted: 04/21/2020 04:53 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely Rebecca Strong

Communication from Public

Name: Latonya Thurman
Date Submitted: 04/21/2020 04:45 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Latonya Thurman

Communication from Public

Name: Liam Fitzpatrick

Date Submitted: 04/21/2020 04:46 PM

Council File No: 20-0407

Comments for Public Posting: This is the BARE MINIMUM the Council can do for citizens. A rent freeze has been desperately needed for over a decade, and is utterly critical now. We've already seen landlords across the city raise rent during this time to force people out of their homes. The Mayor has already established a rent freeze on rent stablized units. And it worked for him! LA citizens LOVED that decision, and it was incredibly well received by the public at large. Let's face reality, here: the LA City Council could use some public good will right now. Pass this motion, it's the least you can do.

Communication from Public

Name: Natalija

Date Submitted: 04/21/2020 04:49 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Natalija

Communication from Public

Name:

Date Submitted: 04/21/2020 04:51 PM

Council File No: 20-0407

Comments for Public Posting: I strongly urge that you enact a rent freeze for rent stabilized apartments during the time of the corona virus disaster. People are experiencing enough disruption without having additional financial obligations piled on them.

Communication from Public

Name: David Alexander

Date Submitted: 04/21/2020 04:51 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here:

Communication from Public

Name: Sandra Ford

Date Submitted: 04/21/2020 04:52 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely,

Communication from Public

Name: Alexander W. Schwada

Date Submitted: 04/21/2020 04:52 PM

Council File No: 20-0407

Comments for Public Posting: I am writing today in opposition to Items 37, 38 and 39. The City has so far ignored that there are 2 sides to the landlord-tenant relationship in its response to the COVID-19 crisis. The City's response has been wholly one sided in favor of renters without any consideration for the pressures landlords face. Even the Los Angeles Times acknowledged that landlords need help (Editorial: It's not just renters. Landlords need help, too). Many tenants are facing hardship at this time, and for those genuinely impacted by the COVID-19 crisis and unable to pay their rent because of it, allowances should be made. The City has already addressed this in its prior motions. However, the City has failed to require that tenants provide proof to landlords that they are unable to pay their rent due to COVID-19. As such, the City's policies are creating a setting for opportunistic tenants to simply not pay their rent, even if they are able to do so. The Items being considered by the Council continue to drive landlords to the brink of insolvency. Item 37 prohibits landlords from the ability to raise rents and is unnecessary given the current climate – in short, landlords are struggling to collect rent, and are not raising rent. Item 38 converts unpaid rent from being subject to unlawful detainers to consumer debt. This robs landlords of the fundamental ability to obtain possession of their unit if the tenant does not repay, makes recovery unlikely and encourages opportunism by tenants to not pay the rent regardless of their ability to pay. Item 39 prevents landlords from even filing a 3 day notice for violation of the lease, depriving landlords of a remedy for serious violations. Below is a sample of some expenses that landlords will continue to have to pay during the COVID-19 crisis: 1. Property taxes 2. Utilities 3. Mortgages 4. Insurance 5. Maintenance How are landlords supposed to pay these costs if tenants have no motivation to make any payments (even if they are able) due to the City's policies? Landlords are the providers of housing – they should not be penalized or punished. They should be supported. But that is not happening in the City of LA. Most apartment owners in LA are mom and pop landlords. They may not make it through this crisis. The City will be pushing these mom and pop owners, who provide low cost housing, out of business. In their place will be large corporate landlords who will raise rents. The City has transitioned to a less and less reasonable approach in its response

to this crisis, which will hurt landlords who provide housing in this City. Los Angeles landlords did not create the COVID 19 crisis, so it is unclear why the City is asking them to shoulder the entire burden of the landlord-tenant relationship. If the City wants to help, it should provide rent vouchers to tenants so that both tenants and landlords can emerge from this crisis solvent and healthy.

Communication from Public

Name: David Poole

Date Submitted: 04/21/2020 04:45 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, David W Poole

Communication from Public

Name: Jacqueline Burbank
Date Submitted: 04/21/2020 04:48 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Jacqueline Burbank

Communication from Public

Name: Ian Jack

Date Submitted: 04/21/2020 04:43 PM

Council File No: 20-0407

Comments for Public Posting: We ask LA city council members to vote NO on motions 37, 38 & 39. My wife and I are seniors who live on the rents from our 3 small rent controlled apartment buildings after we pay the mortgages the taxes and the maintaince on the buildings. Most apartment owners in LA are individuals or small family business like us. The current city mandate for deferment of rent without eviction during the Covid 19 crisis as well as giving tenants 12 months to repay any deferred rent once the emergency is lifted is a difficult but reasonable solution for both tenants and landlords. Please do not impose the additional restrictions in 37 38 & 39 on our ability to collect lawful rent. No one is evicting anyone, we are working with tenants individually to reach balanced positive results. We can't afford to absorb the unintended consequences that these new measures are very likely to create. Thank you Ian Jack

Communication from Public

Name: Teresa Gonzalez

Date Submitted: 04/21/2020 04:43 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Teresa Gonzalez

Communication from Public

Name: Shaya Lowenstein

Date Submitted: 04/21/2020 04:18 PM

Council File No: 20-0407

Comments for Public Posting: Freezing rent increases while property owners are already limited by the RSO will make add unnecessary losses to landlords. Every landlord whom I've spoken with understands that raising rent on a tenant who has suffered a loss of income or is going through a family health crisis is not only wrong, but not a smart business decision. Tenants who have not experienced loss of income for any reason do not need the same protection as those who have.

Communication from Public

Name: Bob Grunauer

Date Submitted: 04/21/2020 04:20 PM

Council File No: 20-0407

Comments for Public Posting: Dear Council Members, Please vote against these provisions. Small businesses such as ours can't continue to exist. Those of us who have struggled and worked hard to build our businesses shouldn't be the ones that get ruined by laws that seek to destroy us. A much better solution would be to institute vouchers that are funded by the government. That way tenants get the help they need and you don't destroy our businesses. The agenda items are anti-business, anti-capitalist and completely unfair to those of us who have struggled our entire lives creating. Please vote against these Agenda Items. Sincerely, Bob Grunauer

Communication from Public

Name: Caroline Contreras
Date Submitted: 04/21/2020 04:40 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Caroline Contreras

Communication from Public

Name: Laura Morales Garcia
Date Submitted: 04/21/2020 04:41 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Laura Morales Garcia

Communication from Public

Name: Ashoke S Talukdar

Date Submitted: 04/21/2020 04:42 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Ashoke Talukdar. Van Nuys, CA

Communication from Public

Name:

Date Submitted: 04/21/2020 03:06 PM

Council File No: 20-0407

Comments for Public Posting: Please strongly oppose items 37, 38, 39. I personally been not able to work for almost 2 months and probably will not work for another 5 weeks. I understand it is hardship for us and the renters. It is vital that the city Council advance universal and balanced solution that serve to assist renters and housing providers alike such as the proposal under consideration in item 66 which calls for the establishment of an emergency relief program. I thank you for your consideration.

Communication from Public

Name:

Date Submitted: 04/21/2020 03:37 PM

Council File No: 20-0407

Comments for Public Posting: My family fled China and immigrated to America to escape persecution, imprisonment and death during Mao Zedong's "revolution". We came here with nothing but through hard work we were able to persevere and regain and rebuild a life here that was taken from our homeland. By continuing that tradition of hard work I have been lucky enough to save enough money to buy a few small properties that now serve as income to me and my family. In order to make any profit, we do all the work ourselves: maintenance, billing, accounting, etc... In order to keep up with the ever increasing costs to maintain the properties and pay the mortgage and utilities that we provide, it is vital to us to be able to have small rent increases yearly. This motion would effectively wipe out any increases we could have had for the year. While we understand that some action needs to be taken by the State, County and City governments to give some relief to those less fortunate they have not taken into consideration the needs and hardship of the property owners. This motion combined with the loss of rent from those that cannot pay will severely affect my ability to pay the mortgage on the property, to provide timely maintenance to the tenants, maintain the condition of the property and pay for the utilities that we provide to our tenants. I strongly urge you to reconsider these motions or give some relief to the property owners as well. By not doing this you will crush all of us who are not backed by a corporation or a conglomerate. We are part of this state, this city and we too are suffering. ````

Communication from Public

Name: ROBIN HAIM

Date Submitted: 04/21/2020 03:40 PM

Council File No: 20-0407

Comments for Public Posting: I am contacting you as a landlord to please note pass Item 37, 38, 39, which will really hurt the small landlords that make a living from their buildings. Already with the local and state laws that currently passed many of us are on the verge of bankruptcy and are not getting paid by our tenants, therefore not able to provide the services that as landlords we have to.

Communication from Public

Name: ROBIN HAIM

Date Submitted: 04/21/2020 03:41 PM

Council File No: 20-0407

Comments for Public Posting: I am contacting you as a landlord to please note pass Item 37, 38, 39, which will really hurt the small landlords that make a living from their buildings. Already with the local and state laws that currently passed many of us are on the verge of bankruptcy and are not getting paid by our tenants, therefore not able to provide the services that as landlords we have to.

Communication from Public

Name: Miriam Miller

Date Submitted: 04/21/2020 02:54 PM

Council File No: 20-0407

Comments for Public Posting: Dear Councilmembers: I am writing to strongly oppose agenda items 37, 38, 39. These measures will bankrupt our business and consequently lead to increased unemployment as we terminate staff and reduce benefits such as medical insurance, 401 (k) matches and other employee related expenses. We will be forced to reduce services to tenants, such as maintenance, janitorial, landscaping, apartment upgrades, facility upgrades such as painting, exterior maintenance and repair. Consequently, these reductions in services would have a “ripple effect” to vendors who supply paint, carpet, maintenance parts, appliances, cabinets, landscaping and janitorial services. Vendors would be forced to reduce their workforce. Over 95% of our costs remain fixed [Foot Note 1 below]. Mortgage payments, utility payments, trash collection, insurance and property tax. As business closes, City income will be reduced both from tax revenue loss and increased costs associated with unemployment compensation payments, Medicaid, food stamps and other services needed for an unemployed citizen. These draconian measures shelter people who are able to pay rent and do not aid those who may be struggling. As employment opportunities contract for business so will our tenants ability to rejoin the workforce be severely reduced. FOOT NOTE 1: FIXED COSTS ARE BASED UPON ACHIEVING 95% OCCUPANCY AND COLLECTION. CURRENTLY OUR OCCUPANCY IS CLOSE TO 90% AND OUR COLLECTION LOSS AND DEFERRAL REPRESENT 20% OF OUR SCHEDULED INCOME. YOUR PROPOSED MEASURES WILL DRAMATICALLY INCREASE OUR COLLECTION LOSS AND BY CONVERTING THE DEFERRED RENT TO CONSUMER DEBT WE WILL HAVE NO WAY TO RECOVER THIS REVENUE IF A TENANT DOES NOT WANT TO PAY. THE ADDITIONAL LOSSES CREATED BY YOUR UNNECESSARY MEASURES WILL MEAN THAT WE NOT BE ABLE TO PAY OUR UTILITY BILLS, PROPERTY INSURANCE PREMIUMS, PROPERTY TAXES, ETC. THIS WILL RESULT IN HUGE LOSSES TO THE CITY OF LOS ANGELES. PLEASE DO NOT APPROVE THESE MEASURES FOR THE GOOD OF OUR COMMUNITY AND THE FUTURE OF OUR ECONOMY.
Miriam Miller Executive Vice President Cordary, Inc. 3611

Motor Avenue Suite 100 Los Angeles, CA 90034 (310) 253-5494
ext. 334 (310) 253-5499 fax

Communication from Public

Name:

Date Submitted: 04/21/2020 02:50 PM

Council File No: 20-0407

Comments for Public Posting: I STRONGLY OPPOSE MOTIONS 37, 38 AND 39. AS A SENIOR, SMALL APARTMENT BUILDING OWNER I AM SUFFERING HARDSHIP TO KEEP AND MAINTAIN MY PROPERTY. THIS IS DUE TO THE EXTREME BURDEN IMPOSED BY ALL THE NEW LAWS WHICH NEVER END. WE ARE ALSO CITIZENS AND VOTERS! THANK YOU

Communication from Public

Name: Roger a Ades
Date Submitted: 04/21/2020 02:38 PM
Council File No: 20-0407
Comments for Public Posting: I'm opposed to this measure. There is already a rent freeze which is ample enough! Thank you. Small property owner.

Communication from Public

Name: Collin

Date Submitted: 04/21/2020 02:32 PM

Council File No: 20-0407

Comments for Public Posting: It's very discouraging to read all the comments from the property owners and business groups that are attempting to place the blame on tenants for not being able to pay rent during a pandemic that will likely last into 2021. What they miss are the nuances of each renter's situation and the incredible burdens that we all face. Federal assistance has been a slow and difficult process for many while the \$1200 stimulus check (for those that have actually received it) is a bandaid that can barely cover a single month's rent in Los Angeles, not to mention our undocumented neighbors who will never see a single cent from the Fed. Service industry workers and freelance contractors are stuck in a precarious place where they can't apply for Federal assistance, but have seen their hours or wages drastically cut, so they continue to put themselves on the line extra each day so they can recoup their lost income. This hasn't been easy on any of us, but in dire situations we need to take equally proportionate actions that are necessary to protecting Angelenos and the legislation proposed by Council Member Bonin are exactly the steps we need. I urge every Council Member to stand on the side of their many constituents, rather than the few business groups, and vote in favor of this proposal (and the rest proposed by Bonin).

Communication from Public

Name:

Date Submitted: 04/21/2020 01:49 PM

Council File No: 20-0407

Comments for Public Posting: It has come to my attention as a California property owner that there is an unethical bill under consideration—AB 828. In essence, the bill aims to afford all California renters an unqualified 25 percent reduction in monthly rent, license for legislative councils to determine and thereby change existing rent agreements, and numerous other tenant benefits, including tying owners' hands from evicting troublesome or non-compliant tenants. As if AB 828 were not damaging enough to housing providers, the Los Angeles City Council has taken up the "anti-owners" charge and is proposing the following further handicaps: Item 37, a retroactive rent increase freeze extending for 90 days beyond the end of the lockdown; Item 38, reclassifying unpaid rent as consumer debt, whereby the public at large assumes renters' debts; and Item 39, expanding the eviction process for a full year, during which time the renter remains on site for free. I would question the legality and integrity of the AB 828 bill, together with the aforementioned Los Angeles City Council proposals. They outright disregard owners' constitutional and legal rights. The state and federal constitution both grant property owners the authority to set their rents within reasonable boundaries. No legislature or contrived policy can arbitrarily dismiss that right. Furthermore, the agreement between a tenant and an owner is a legally binding contract; only a new, updated agreement between said tenant and owner can lawfully change the terms of said contract. As for the Los Angeles City Council proposals, they further chip away at owners ability to maintain clean, pleasant, efficient and comfortable housing by reducing income that would normally be allotted for those purposes—thus creating a lose-lose situation. Property owners have been ignored and sidelined throughout this whole pandemic situation. Tenants have been granted a multitude of concessions to make their financial load more tolerable, but that courtesy has NOT been extended to landlords. Even our minor request for a delay in the recent property tax deadline was seen as not worthy of discussion. The fact of the matter is that owners will only put up with so much before they rebel. And if any of these bills or motions go into effect, they will definitely rebel! You have only to look at the below two articles mentioned to see the very negative reaction landlords have to the mandates already in effect, and the

unscrupulous ways they are combating it: “Evictions of Elderly, Ill and Pregnant Continue During Pandemic,” April 17, 2020, Sam Levin, The Guardian; “Landlords Exchanging Rent for Sex,” April 17, 2020, Gwen Aviles, NBC News. With more and more of the financial burden thrust upon housing providers like myself, many are likely to be put in a position where they can’t meet their mortgages on these properties. Eventually, the banks holding the liens would in turn suffer, thus hurting the economy even worse. As some of these landowners run out of money, they may abandon the properties, letting them run into foreclosure. How happy would the voters be if there were a glut of apartments slowly turning into slums with absentee owners? These disaster scenarios could easily happen. Owners, like governmental bodies, are not made of bottomless funds waiting to be stolen bit by bit. We work for our assets just as hard as tenants work for their rent. Please show us the respect and consideration you are so eager to give to those we house. Please vote NO on AB 828 and Motions 37, 38 and 39!!! Sincerely, Gabriella Harvey

Communication from Public

Name: Erich Bollmann
Date Submitted: 04/21/2020 01:50 PM
Council File No: 20-0407

Comments for Public Posting: I strongly urge council to pass this measure freezing rent increases during the COVID-19 crisis and it's aftermath. As if the fear of eviction wasn't enough, it is incomprehensible that landlords and property management companies might consider using this public health crisis as an opportunity to squeeze renters even further. When the majority of our city rents, and news reports indicate over half of LA County residents have lost their jobs due to COVID-19, it's clear we must do everything possible to ensure those with homes can stay in them, and that we don't make our homelessness crisis even worse.

Communication from Public

Name: Steven K. Fowlkes

Date Submitted: 04/21/2020 01:27 PM

Council File No: 20-0407

Comments for Public Posting: Rent Freeze Motion - I strongly oppose rolling back any rent increases that were in place as of March 4, 2020 as well as the prohibiting of an new increases until 90 days after this emergency ends. This is a huge loss in revenue that impacts all owner/investors. With this Motion, it will hamper Property improvements which is strongly opposed.

Communication from Public

Name:

Date Submitted: 04/21/2020 01:32 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA Council members, I understand that many of you are landlords, but I hope you realize that many of the people that you serve as a council member are renters. The renters are facing some of the most financially difficult times of our lives. We are losing our jobs, our families may be sick, and we have no one else to depend on. These renters are the ones that voted you into office, hoping that you would keep our needs in mind, especially during times like these. Please act in favor of the less fortunate - your renters who are facing financial challenges. Please vote yes for rent freeze. We need it, and we are the ones desperate. There's many more renters than landlords and we need your help and support.

Communication from Public

Name:

Date Submitted: 04/21/2020 02:08 PM

Council File No: 20-0407

Comments for Public Posting: Dear Council Member, As a housing provider in L.A., I am strongly opposed to items 37, 38 & 39 on the upcoming council agenda. Parts of these proposals are likely unlawful as they are governed by state and federal law, have had no discussion and are redundant of actions already taken. These proposals do not aim to alleviate issues related to COVID-19 but further amplify the economic damage. Many housing providers are not eligible for mortgage relief. I recognize everyone is struggling, including myself. I urge you to focus on solutions such as supporting and expanding item 66, the renters relief program. Thank you for your consideration

Communication from Public

Name: Veronica

Date Submitted: 04/21/2020 06:02 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely,

Communication from Public

Name: Carole Keligian
Date Submitted: 04/21/2020 06:03 PM
Council File No: 20-0407

Comments for Public Posting: You are already allowing renters to withhold rent if they are affected by COVID-19. While they are withholding rent, owners still have to maintain the buildings and pay all expenses. How long can they do this without rent? It's an onerous burden to put solely on building owners. Would you force supermarkets to give out free food? Are you forcing the utility companies to stop charging? How about cable & internet companies? ARE YOU CUTTING YOUR SALARIES? Owning and maintaining an apartment building is a business--it needs to make money because owners need a salary, too. Many older owners are retired and depend on their buildings for the majority of their income. The tiny increases allowed by the current rent control ordinance barely allow owners to keep up with inflation. Now you want to freeze rents while all other expenses continue to rise. Plus, you expect owners to carry renters who claim they can't pay. The burden of helping affected renters should be shouldered by the entire city, not the building owners who, due to rent control, already subsidize the lifestyles of ALL their tenants, even the ones who can pay. I noticed that one person made a comment that opposing this measure is "Trumpian". Well, supporting it is Fascist. The City Council acts like a totalitarian government, without any consideration of the unintended consequences of hasty measures that only consider one side of the story. Why is it okay to arbitrarily impose a severe financial burden on just one group of people? It's not.

Communication from Public

Name: Samantha

Date Submitted: 04/21/2020 05:55 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Samantha

Communication from Public

Name: Edwin Millan

Date Submitted: 04/21/2020 05:58 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Edwin Millan

Communication from Public

Name: J Carl Devine

Date Submitted: 04/21/2020 06:42 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I'm writing to you to express my support for written comments submitted. Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, J Carl Devine

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Communication from Public

Name: Yennaedo Balloo

Date Submitted: 04/21/2020 06:33 PM

Council File No: 20-0407

Comments for Public Posting: Even aside from the circumstances of COVID-19 and unprecedented unemployment and furlough of employees, Los Angeles is so clearly experiencing rapid rent inflation that already outstrips demand and market solubility. It is irresponsible to continue to feed this greed with so many homeless and so many more struggling to find living quarters.

Communication from Public

Name: Jeff Owens

Date Submitted: 04/21/2020 07:01 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Jeff Owens

Communication from Public

Name:

Date Submitted: 04/21/2020 07:06 PM

Council File No: 20-0407

Comments for Public Posting: Housing is a human right. Given the hardships created by the COVID-19 pandemic, it's a right that needs to be protected now more than ever. A freeze on rent increases during the pandemic and for at least 90 days after would be an important step toward securing that right.

Communication from Public

Name: Ace Katano

Date Submitted: 04/21/2020 05:44 PM

Council File No: 20-0407

Comments for Public Posting: I support the motion. At this moment of crisis it would be incredibly irresponsible to allow profiteering by landlords when so many people are unsure of where their next paycheck is coming from.

Communication from Public

Name: Timothy J Webb Jr

Date Submitted: 04/21/2020 05:51 PM

Council File No: 20-0407

Comments for Public Posting: Dear La City Council I am writing you to express my support for the written, comments submitted by Housing is a human right director Rene Moya Housing Is A Human Right 6500 Sunset Blvd. Los Angeles, CA 90027 21 April 2020 Honorable City Council Members Los Angeles City Council 200 North Spring Street Los Angeles. CA 90017 Dear City Council Members: As housing justice advocates from Housing Is A Human Right (HHR) — an advocacy organization dedicated to making sure housing becomes a human right — we are submitting this letter in regards to the City Council hearing to be held on April 22, 2020. Given the unprecedented public health crisis and massive economic impact, caused by the COVID-19 pandemic, now more than ever, your constituents desperately need adequate tenants protection. We applaud the City Council for taking on these issues. We would also, of course, like to see more. In regards to item #37, we strongly support the City taking action to freeze rent increases for all rental housing units. Since a statewide stay at home order was put in place to protect Californians from the spread of the coronavirus, over 3 million Californians have filed for unemployment, and the unemployment rate is likely to climb to levels unseen since the Great Depression. State and local officials need to act to ensure renters in Los Angeles and across California do not face increased housing insecurity at a time of economic collapse. We, therefore, support all efforts to ensure Los Angeles renters do not face unsustainable rent increases in the short- and medium-term, which will only prolong the pain and hamper the economic recovery. Los Angeles must call for the immediate suspension of the Costa-Hawkins Rental Housing Act of 1995 to remove barriers to the City's powers to protect renters. Failure to act will result in hundreds of thousands of renters losing their homes over the coming year. In addition, we call on City Council to endorse the Rental Affordability Act —a proposed ballot initiative that would allow cities and counties to expand rent control in California. Furthermore, we have also added additional comments for the following items: #11 - SUPPORT IF AMENDED. We support all efforts that prevent inequitable distribution and availability of goods at all times, but especially during a crisis. Price gouging is a problem we see throughout the City. Strong measures must be taken to halt it and apply

appropriate consequences. This measure needs to be more specific as to what constitutes price gouging and what penalties will be imposed; it needs to be in line with any existing rules, regulations, ordinances, and statutes. #25 - SUPPORT IF AMENDED. We urge the City Council to enact actions for the distribution of parking permits for front line medical staff. Seattle, which has been heavily impacted by COVID cases since early March, quickly adopted a permit program to allow hospital staff to park on nearby streets. This permit, which began on March 30, reduces some of the stress involved in going to work for these essential healthcare workers. Los Angeles is a city infamous for high traffic and minimal available parking. With this item, which would make temporary parking zones for medical providers, LA can show their healthcare workers that we appreciate their hard work by reducing the time and stress involved in hunting for a parking space at work. The concern we have with this streamlining process for street closures is that it should not result in moving, disrupting, or harassing unhoused people during this emergency. Further, we have concerns that specific, enforceable provisions for ending this easier process for closing streets after the urgent needs of dealing with the coronavirus have ended. #28 - SUPPORT. We ask that the City Council use all its efforts and relationships to negotiate with lenders to help keep our residents housed. We should be able to carry any unpaid portion of a mortgage to the end of the mortgage to give homeowners and landlords a chance to get back up on their feet. Extensions to pay back mortgage payments must match our renter's relief to be extended for 12 months to have consistency and realistic deadlines. #29 - SUPPORT. #33 - SUPPORT. We strongly urge City Council to adopt this motion to find and fill any gaps in federal assistance for Undocumented immigrants impacted by COVID-19 in Los Angeles. In California, there are 2.3 million undocumented immigrants, and they contribute 2.5 billion in state and local taxes. Los Angeles has the highest number of undocumented immigrants in the entire State, with upwards of 814,000. This community is part of the fabric of our City and contributes to its diversity and wealth. They deserve as much help as any Angeleno because, in the end, they are Angelenos. #34 - SUPPORT. As transportation continues to be an ongoing struggle for those living on the streets of Los Angeles, we support the use of under-utilized City LADOT

Communication from Public

Name: Samantha Granberry
Date Submitted: 04/21/2020 05:53 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Samantha Granberry

Communication from Public

Name: Katie

Date Submitted: 04/21/2020 05:54 PM

Council File No: 20-0407

Comments for Public Posting: LA is made up of renters who are currently impacted by unemployment or the inability to work due to COVID-19. A rent increase freeze is a no-brainer. By increasing rent in Los Angeles, you are hurting your own population even if it benefits special interest or possibly your own interest. We all have to do our part during this crisis and hopefully you'll take the L in terms of profit but a W in terms of PR.

Communication from Public

Name: Jonathan

Date Submitted: 04/21/2020 05:03 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Jonathan Jackson

Communication from Public

Name: John Reed
Date Submitted: 04/21/2020 05:07 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right.

Communication from Public

Name:

Date Submitted: 04/21/2020 05:07 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Melissa B.

Communication from Public

Name: Trang N

Date Submitted: 04/21/2020 05:02 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely,

Communication from Public

Name: Jacquelyn
Date Submitted: 04/21/2020 05:32 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Jacquelyn Harris

Communication from Public

Name:

Date Submitted: 04/21/2020 05:32 PM

Council File No: 20-0407

Comments for Public Posting: RENT FREEZE NOW. PROTECT COST BURDENED RENTERS FROM DEBT OR WORSE. RENT AND MORTGAGE FREEZE NOW. NO WAGES NO RENT NO RENT INCREASES.

Communication from Public

Name: Victor Huerta

Date Submitted: 04/21/2020 05:40 PM

Council File No: 20-0407

Comments for Public Posting: Almost 2/3 of people (63%) in Los Angeles rent their homes. You can imagine that, as more Angelenos lose their jobs, it'll be harder to sustain their families, to pay rent, to pay bills with the minor assistance they receive from the federal and state governments and that's IF they receive it. When 1/3 of all households in LA earn less than \$40,000 a year, it's doubtful that many of these families have any savings to get them through this crisis. They simply cannot afford to have their rent increased. The City needs to enforce any and all measures aimed at protecting working-class families whose incomes have been decimated by layoffs, furloughs, and business closures. One of the most important ways for them to do that is through protecting their housing immediately and for the foreseeable future. A freeze on rent increases is the bare minimum and just a small cog in the machine. I implore you to do much more than this: freeze evictions, pause rent payments city-wide, increase government-funded assistance to undocumented persons, urge the Mayor and Governor to expand Project Roomkey to support ALL people experiencing homelessness. We are only as strong as those most vulnerable among us. Will you help lift up all of us, or will you deprive us of the safety nets we all deserve? (Data from DataUSA, which draws on ACS and Census data.)

Communication from Public

Name: John Farina

Date Submitted: 04/21/2020 05:20 PM

Council File No: 20-0407

Comments for Public Posting: To the Members of the Los Angeles City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here:

<https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, John Farina

Communication from Public

Name: Patrick McDonald
Date Submitted: 04/21/2020 05:23 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Patrick McDonald

Communication from Public

Name: John Hassell

Date Submitted: 04/21/2020 05:23 PM

Council File No: 20-0407

Comments for Public Posting: Dear Members of the Los Angeles City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here:

<https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, John Hassell

Communication from Public

Name: Jesse Brooks

Date Submitted: 04/21/2020 05:25 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Jesse Brooks

Communication from Public

Name:

Date Submitted: 04/21/2020 10:29 PM

Council File No: 20-0407

Comments for Public Posting: I am writing on behalf of the Healthy LA Coalition, as a currently-sheltered parent and educator who is recovering from COVID-19 with my family, in urgent SUPPORT of this motion. A retroactive ordinance that takes into account the grim implications of sudden, mass unemployment for our already rent-burdened tenant majority is a gestural but necessary step towards preempting a looming explosion of displacement and hardship that continues to imperil our unhoused neighbors and community members. While a prohibition of rent increases during this unprecedented time might belie the assumptive landlordism that informs the discourse at City Council, I implore its members to weigh this motion for the role it will play in saving the lives of its constituents over the profit margins that it might momentarily unsettle for the euphemistically-named, 'housing provider' donor class.

Communication from Public

Name: Doug Smith

Date Submitted: 04/21/2020 11:01 PM

Council File No: 20-0407

Comments for Public Posting: Dear Councilmembers, On behalf of Public Counsel, Inner City Law Center, HEART LA, the Public Interest Law Project, and Eviction Defense Network, please see the attached letter with legal analysis concerning three motions on the agenda for tomorrow's meeting: (1) a full eviction moratorium (agenda item 39, CF 20-0404); (2) unpaid rent (agenda item 38 CF 20-0409); and (3) a rent freeze (agenda item 37 CF 20-0407). We urge you to adopt these motions and advance these policies to help millions of Angelenos endure this unimaginable public health emergency with stable housing. Thank you for your careful attention to these issues and all your work to keep LA as safe as possible during this crisis. Sincerely, Doug Smith Public Counsel

April 21, 2020

Honorable Members of the City Council
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: Legal Analysis of Proposed Renter Protections in Council Files 20-0404, 20-0409, 20-0407

Dear Honorable Council Members:

The undersigned public interest and civil rights law firms write in support of several motions that will be considered by the Los Angeles City Council on April 22, 2020, including agenda item number 37 (CF 20-0407) relative to a rent freeze; agenda item number 38 (CF 20-0409) relative to clarifying that unpaid rent is not subject to the unlawful detainer process; and agenda item number 39 (CF 20-0404) relative to prohibiting the termination of a tenancy during the State of Emergency.

This current public health crisis is the worst we have seen in a century. More than 40,000 people have died across the country, including over 600 in Los Angeles County, and the toll will continue to rise in the coming weeks.¹ Due to the strict but necessary Safe at Home orders, businesses have shut down or drastically scaled back across the city, causing massive worker layoffs. According to recent estimates, less than half of Los Angeles County residents are still employed.² The impact of these layoffs is that millions of Angelenos are wondering how they are going to afford rent and put food on the table. And the crisis is disproportionately affecting Black and Brown communities, reflecting entrenched structural and economic inequalities.³

As public interest law firms serving the most vulnerable residents in Los Angeles County, we are seeing firsthand these devastating impacts of COVID-19. As housing lawyers, we are working around the clock to provide direct services and advocacy support in the midst of this terrible confluence of a catastrophic public health disaster and a worsening crisis of housing instability and homelessness. The simple fact is that Angelenos are only safer at home if they can stay in their homes. While the Mayor and City Council adopted important protections over the last several weeks, the current policies still have substantial gaps that need to be addressed. Our organizations continue to be inundated with calls from tenants who are receiving eviction notices, being locked out of their homes, being intimidated or harassed, being asked to sign forms and produce documents with personal information, or are generally confused about their rights under the existing patchwork of new laws. Tens of thousands more, who are unable to access legal services, are enduring the same conditions.

This crisis demands bold actions from our leaders. In reference to the sweeping emergency rules adopted by the Judicial Council on April 6th, Chief Justice Tani Cantil-Sakauye wrote: “We are at this point truly with no guidance in history, law, or precedent. And to say that there is no playbook is a gross

¹ “Novel Coronavirus in Los Angeles County,” County of Los Angeles Public Health, last updated April 20, 2020, <http://publichealth.lacounty.gov/media/Coronavirus/locations.htm>.

² “Less than half of L.A. County residents still have jobs amid coronavirus crisis,” Jaelyn Cosgrove, Los Angeles Times April, 17, 2020, <https://www.latimes.com/california/story/2020-04-17/usc-coronavirus-survey>.

³ “‘A crisis within a crisis’: Black Americans face higher rates of coronavirus deaths,” Jenny Jarvie and Molly Hennessy-Fiske, Los Angeles Times, April 7, 2020, <https://www.latimes.com/world-nation/story/2020-04-07/a-crisis-within-a-crisis-black-americans-face-higher-rates-of-coronavirus-deaths>.

understatement of the situation.”⁴ As the Judicial Council did in exercising its powers over the courts, so too the City of Los Angeles must exercise its police powers to the fullest extent and take the courageous steps necessary to keep people housed during the crisis.

I. The City Council should approve item 39 (CF 20-0404) because a complete eviction moratorium is lawful and necessary in this moment.

A. The City’s current eviction ordinance does not prevent all evictions, leaving thousands of Angelenos now at risk of displacement and homelessness.

We applaud the Mayor and City Council for taking action to enact Ordinance 186585 to protect tenants against certain types of eviction during this emergency. But more is needed. The City’s current eviction ordinance does not do enough to discourage the initiation of the eviction process, which sows doubt and confusion leading to renters being harassed and intimidated into leaving their homes. The ordinance also fails to provide any protections against certain types of evictions.

In Los Angeles, tenants are very often displaced from their homes even before an unlawful detainer action is filed. Waiting for eviction proceedings to begin can severely compromise a tenant’s ability to rent another home. Furthermore, many tenants are unaware of their rights, and have little access to legal aid services, especially in the middle of a pandemic. This is why many of the undersigned organizations have vigorously supported a Right to Counsel. Right now, we are far from guaranteeing every tenant access to legal counsel, and if we wait until a court proceeding is initiated, countless tenants will be displaced. By imposing onerous requirements that tenants must prove that nonpayment of rent is due to COVID-19 -- a burden that disproportionately harms immigrant, gig-economy, and informal sector workers – the City has established a confusing and overly technical framework. Unsurprisingly, in the days after this requirement was adopted, our organizations fielded numerous calls and the media reported on widespread examples of tenants being directed to sign documents and provide personal information that is not legally required in order to avoid eviction. Our clients are still receiving eviction notices after the City’s ordinance was adopted, as some landlords are already setting the stage for eviction proceedings as soon as the courts open back up. Other clients are enduring illegal lockouts and other intimidation tactics. If the City Council fails to strengthen the current incomplete framework, renters will only face more confusion, harassment, and intimidation in the midst of an already unimaginable public health threat, which will only increase the risk of displacement and homelessness during and after the emergency.

In addition to the displacement risks stemming from the confusing and incomplete non-payment standards, there are still many grounds for eviction that are simply not covered by the current ordinance. For example, a low-income and undocumented immigrant street vendor may not be able to provide the formal documentation necessary to show a loss of income directly related to the pandemic, even though the City has requested increased enforcement to shut down their business and they are unable to access federal relief programs. Should this person be evicted right now? A worker who is fortunate enough to still be employed may install desk and shelving for a work-from-home station that violates a lease term concerning unapproved decorating or construction. Should this person be evicted right now?

The current eviction ordinance was an important first step, but it is time to eliminate the confusion and close the gaps. Los Angeles renters need the simple yet comprehensive prohibition on evictions proposed under CF 20-0404.

⁴ California Courts, Judicial Council News Release: *Judicial Council Adopts New Rules to Lower Jail Population, Suspend Evictions and Foreclosures*. April 6, 2020, <https://newsroom.courts.ca.gov/news/judicial-council-adopts-new-rules-to-lower-jail-population-suspend-evictions-and-foreclosures>.

B. The City has the authority under its police power to enact a broad eviction moratorium.

The City has the power to take greater action to protect tenants under both its police powers and emergency powers. The California Constitution sets forth the City's broad police powers by stating "[a] county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws."⁵ Legislative enactments analyzed for validity under the police power must be reasonably related to a "legitimate governmental purpose, and [courts must avoid] confus[ing] reasonableness in this context with wisdom."⁶ Ordinances enacted pursuant to the police powers must be upheld unless there is a "complete absence of even a debatable rational basis" that the ordinance serves as "a reasonable means of counteracting harms and dangers to the public health and welfare emanating from a housing shortage."⁷

While some might suggest that the power to regulate eviction is reserved to the state eviction statutes, all cities and counties, pursuant to their police power, have the authority to create "substantive limitations on otherwise available grounds for eviction," provided such limitations are not procedural in nature and "do not alter the Evidence Code burdens of proof."⁸ Substantive regulation on the grounds for eviction include limiting the causes of action available to landlords to use as grounds for evicting tenants and have been consistently upheld over the past several decades.⁹ Courts have distinguished permissible substantive limitations from impermissible procedural limitations outside the context of a public health emergency. The Motion under File No. 20-0404 directs the City Attorney to prepare an ordinance that would affect substantive limitations on the grounds of eviction, as authorized by the police power, and procedural limitations on eviction, such as prohibiting the issuance of notices and filing of unlawful detainer actions that the City's emergency powers authorize in these dire circumstances.¹⁰ The Mayor has already invoked his emergency authority to temporarily suspend no-fault evictions if occupants were "ill, in isolation, or under quarantine," and Ellis Act evictions of occupied rental units. The Mayor's Public Order included a ban on the issuance of eviction notices and the filing of unlawful detainers on these grounds.¹¹

⁵ Cal. Const. at XI, section 7.

⁶ *Birkenfeld v. City of Berkeley* (1976) 17 Cal.3d 129, 159.

⁷ *Id.* at 161.

⁸ *Rental Housing Assn. of Northern Alameda County v. City of Oakland* (2009) 171 Cal. App. 4th 741, 755, 763, citing *Birkenfeld v. City of Berkeley* (1976) 17 Cal.3d 129, 147-149. In *Birkenfeld*, the court held that the City of Berkeley's ordinance requiring landlords to obtain a certificate of eviction before filing an unlawful detainer was an impermissible procedural barrier, calling the process full of "elaborate prerequisites." *Id.* at 161. The court held that state law governing unlawful detainer procedures "fully occupy the field of landlord's possessory remedies," and therefore preempted the City's requirement for a certificate of eviction.

⁹ In *Roble Vista Associates v. Bacon*, the court upheld a city ordinance that (1) required landlords to offer tenants one-year leases at a fixed rental rate during the lease term and (2) provided an affirmative defense to tenants in unlawful detainer actions if their landlords failed to do so. (2002) 97 Cal.App.4th 335, 337-38, 342. Similarly, in *Rental Housing Assn. of Northern Alameda County v. City of Oakland*, the court upheld certain portions of a local ordinance that required landlords seeking to recover their units to "act in good faith" and imposed other substantive requirements to substantiate certain causes of action for an unlawful detainer action. (2009) 171 Cal.App.4th 741, 754. These provisions of the ordinance were not preempted by the state unlawful detainer statutes. *Id.* at 759, 764-765.

¹⁰ Cal. Gov. Code § 8634.

¹¹ See "Mayor Garcetti orders new restrictions on evictions, announces indefinite moratorium on water and power shutoffs in fight against COVID-19," City of Los Angeles, March 23, 2020, <https://www.lamayor.org/mayor-garcetti-orders-new-restrictions-evictions-announces-indefinite-moratorium-water-and-power>.

Furthermore, courts have upheld ordinances that have incidental procedural impacts. In *San Francisco Apartment Assn. v. City and County of San Francisco*, the court held that unlawful detainer statutes did not preempt a local ordinance that imposed a delay on evicting families and educators on no-fault grounds.¹² The court found that the ordinance imposed a “procedural impact, limiting the timing of certain evictions.”¹³ The procedural impact was “necessary to ‘regulate the substantive grounds’” of no-fault evictions in order to protect children from displacement during the school year.¹⁴ Furthermore, the ordinance was not a procedural limitation on the grounds for eviction because it “[did] not require landlords to provide written notice or to do any other affirmative act.”¹⁵ The court concluded that the ordinance created a “permissible ‘limitation upon the landlord’s property rights under the police power,’ rather than an impermissible infringement on the landlord’s unlawful detainer remedy” under state law.¹⁶ Here, a temporary eviction moratorium removing substantive bases for eviction clearly fits within the category of substantive regulation reserved for the local jurisdiction to regulate.

The City has a significant governmental interest in ensuring housing security and stability and preventing widespread homelessness that will result from evictions that are processed once the emergency orders are lifted, which will create a secondary public health emergency in a city that already has the worst unsheltered crisis and affordable housing crisis in the country. The temporary eviction moratorium proposed under CF 20-0404 is unquestionably related to, and indeed necessary to achieve this important purpose. Such action, taken during the course of a historic pandemic, is unquestionably a reasonable exercise of the City’s police powers, which the courts will grant great deference to. Additionally, as set forth below, the actions are neither preempted nor unconstitutional.

C. The City is authorized to enact an eviction moratorium by the California Emergency Services Act.

During a declared state of emergency, the California Emergency Services Act (CESA) authorizes the City Council to “promulgate orders and regulations necessary to provide for the protection of life and property”¹⁷ which here includes remaining in existing homes pursuant to shelter in place orders by state and local entities. On March 19, Governor Newsom issued Executive Order N-33-20, which authorized and concurrently included an order from the State Public Health Officer, requiring “all individuals living in the State of California to stay home or at their place of residence except as needed to maintain continuity of operations.” The Governor’s subsequent Executive Order N-37-20 directly links the need to minimize evictions in order to comply with the stay at home directive in the March 19 Order.¹⁸

On March 4, the Mayor declared a local state of emergency in the City, which has been approved by the City Council.¹⁹ As such, the CESA authorizes the City Council to take action to enact orders necessary to provide for the protection of life and property, which will unquestionably be furthered by an eviction moratorium. The CESA requires that the governing body, in this case the City Council, to review the ongoing need to continue the local emergency at least once every 60 days until it terminates

¹² (2018) 20 Cal.App.5th 510, 513.

¹³ *Id.* at 510, 518.

¹⁴ *Id.* at 518.

¹⁵ *Id.*

¹⁶ *Id.* at 518-19, citing *Birkenfeld*, 17 Cal. 3d at 149.

¹⁷ Cal. Gov. Code § 8634.

¹⁸ Cal Exec. Order No. N-37-20 (March 27, 2020), available at: <https://www.gov.ca.gov/wp-content/uploads/2020/03/3.27.20-EO-N-37-20.pdf>.

¹⁹ City of Los Angeles, Office of the Mayor. Declaration of Local Emergency, March 4, 2020. Accessible at: http://clkrep.lacity.org/onlinedocs/2020/20-0291_reso_03-04-2020.pdf.

the emergency.²⁰ The City Council should exercise its authority to take local measures authorized by state law to effectuate the stay at home orders to ensure public safety.

D. A broad eviction moratorium is supported by the Governor’s Executive Orders suspending any state law that could preempt the local effort, and is not otherwise preempted by existing state law.

Although a city’s police power is broad, it cannot conflict with the general laws of the State of California. A conflict exists between a local ordinance and state law if the ordinance “duplicates, contradicts, or enters an area fully occupied by general law, either expressly or by legislative implication.”²¹ However, when a city or county “...regulates in an area over which it traditionally has exercised control ... California courts will presume, absent a clear indication of preemptive intent from the Legislature, that such regulation is *not* preempted by state statute.”²²

In enacting Executive Order N-28-20 on March 16, 2020, the Governor explicitly suspended “[a]ny provision of state law that would preempt or otherwise restrict a local government’s exercise of its police power to impose substantive limitations on residential or commercial evictions.”²³ This Executive Order provides explicit authority to enact a broad eviction moratorium. Moreover, the Governor’s Business, Consumer Services and Housing Agency published guidance for city and county governments that explicitly says: “Nor does the Executive Order prohibit a city or county from imposing an absolute limitation on all evictions.”²⁴

Consistent with this Order, the City has already adopted an ordinance *that goes beyond the provisions of the Governor’s order*. Several other cities across California have likewise adopted local ordinances that go further than the Governor’s order, including Oakland, which has adopted a complete eviction moratorium. Even the California Apartment Association does not dispute the ability of a local city to adopt an ordinance that goes further than the Governor’s order, plainly stating, “The Governor’s Order does not preempt local eviction moratoria.”²⁵

Beyond the clear legislative intent, there is also no conflict preemption. Under a conflict preemption analysis, the question is whether it is possible for a person to follow both laws at the same time. The Governor’s order is limited to non-payment of rent related to COVID-19. So expanding LA’s ordinance would involve covering other non-nonpayment grounds for eviction and nonpayment eviction that is not proven to be related to COVID-19. Since the Order doesn’t expressly regulate these, and there is intent not to preempt the field, then these would be additional protections at the local level but landlords and tenants could still follow both the Governor’s order and the new Los Angeles provisions, so there is no conflict preemption.

While the Governor’s first Executive Order explicitly removes preemption concerns for the limited types of evictions in the Order, the City may still use its full police powers to go farther than the

²⁰ Cal. Gov. Code § 8630(c).

²¹ See *Viacom Outdoor Inc. v. City of Arcata* (2006) 140 Cal.App.4th 230, 236.

²² See *San Francisco Apartment Assn. v. City and County of San Francisco* (2018) 20 Cal.App.5th 510, 515..

²³ Cal. Exec. Order No. N-28-20 (Mar. 16, 2020), available at:

<https://www.gov.ca.gov/wpcontent/uploads/2020/03/3.16.20-Executive-Order.pdf>.

²⁴ *State of California, Business Consumer Services and Housing Agency. Guidance and Frequently Asked Questions on Residential and Commercial Eviction Limitations and Moratoriums During the COVID-19 Pandemic*, pg. 6, published April 7, 2020.

²⁵ California Apartment Association Industry Insights, “Frequently Asked Questions: Governor Newsom’s Executive Orders on Evictions During the COVID-19 Pandemic,” California Apartment Association, revised April 2020, available at <https://caanet.org/kb/download/58804.kbd>.

EO for other types of evictions. Put another way, the silence on other types of evictions does not implicitly mean the City is preempted from regulating them. The City is only preempted if there were to be conflict with state law. The City can both comply with the Executive Order and go farther than the executive Order so long as there isn't a conflict. Because state law grants local jurisdictions the authority to regulate the substantive grounds for eviction,²⁶ no such conflict exists.

E. A broad eviction moratorium is not unconstitutional under the Takings Clause.

The proposed temporary eviction moratorium would not rise to the level of a “taking” under longstanding case law. Both the United States Constitution and the California Constitution prohibit the taking of private property for public use without just compensation.²⁷ The Takings Clause of the California Constitution is generally interpreted congruently with the Takings Clause of the Fifth Amendment.²⁸

The government’s regulation of private property will constitute a taking of such property only if it is “so onerous that its effect is tantamount to a direct appropriation or ouster.”²⁹ Such “regulatory takings” will constitute “per se” takings requiring compensation only if they either (i) result in a permanent physical invasion of property or (ii) deprive a property owner of all economically beneficial or productive use of the property in question.³⁰ Otherwise, government regulation that does not result in a “per se” taking *may* still constitute a taking, but only if it is found to be “functionally equivalent” to a direct appropriation or ouster under the “essentially ad hoc” fact-specific inquiry described in the *Penn Central* case.³¹

Because the proposed measure would neither result in a permanent physical invasion of property nor in a complete deprivation of economic use of the property in question, it should be analyzed under the *Penn Central* standard. The *Penn Central* inquiry focuses on two primary factors: (i) the economic impact of the regulation on the property’s owner and (ii) the investment-backed expectations of the owner. This inquiry also takes into account the character of the government action – a taking is more likely to be found when the regulation can be characterized as a “physical invasion by government” as opposed to “a public program adjusting the benefits and burdens of economic life to promote the common good.”³² In analyzing whether a taking has occurred, the court does not analyze whether the owner’s rights in one particular segment of the property have been abrogated, but rather focuses on “the nature and extent of the interference with rights in the parcel as a whole.”³³

The threshold for a taking under the *Penn Central* analysis is high. In applying the *Penn Central* factors, the Ninth Circuit Court of Appeals has observed that “diminution in property value because of governmental regulation ranging from 75% to 92.5% does not constitute a taking” and that it is not aware

²⁶ See *Fisher v. City of Berkeley* (1984) 37 Cal. 3d 644, 707 (holding that a city may regulate the substantive grounds of eviction, even to the point of “effectively eliminat[ing]” a ground for eviction in state law.) See also *Birkenfeld v. City of Berkeley* (1976) 17 Cal. 3d 129, 148-149.

²⁷ U.S. Const., amend. 5, 14; Cal. Const., art. I, § 19(a).

²⁸ *San Remo Hotel v. City and County of San Francisco* (2002) 27 Cal.4th 643, 664.

²⁹ *Lingle v. Chevron U.S.A. Inc.*, 544 U.S. 528, 537 (2005).

³⁰ *Lucas v. S.C. Coastal Council* 505 U.S. 1003, 1015-17 (1992). A third category, not applicable here, involves a land-use exaction, where the government conditions the issuance of a development permit on a landowner’s dedication of an easement on the property allowing for public use. *Lingle* at 546-548; See also *Nollan v. California Coastal Comm’n*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994).

³¹ *Penn Cent. Transp. Co. v. New York City*, 438 U.S. 104, 124 (1978); *Lingle* at 538; *Kavanau v. Santa Monica Rent Control Bd.*, 16 Cal.4th 761, 774 (1997).

³² *Penn Central* at 124; *Lingle* at 538-39 (2005).

³³ *Tahoe-Sierra Pres. Council v. Tahoe Reg’l Planning Agency*, 535 U.S. 302, 327 (2002).

of any case in which a court has found a taking where diminution in value of the property in question was less than 50%.³⁴ Moreover, a loss of profits due to a restriction on the use of the property – unaccompanied by a physical property restriction -- is generally viewed as a weak basis for a takings claim.³⁵ As the Supreme Court noted in *Andrus v. Allard*, “[G]overnment regulation -- by definition -- involves the adjustment of rights for the public good” and that although such adjustments often limit in some way the economic exploitation of private property “[t]o require compensation in all such circumstances would effectively compel the government to regulate by purchase.”³⁶

A full eviction moratorium would not constitute a taking under a *Penn Central* analysis because of its limited impact on the overall values of the affected properties, its time-limited nature, and its similarity to existing measures. The eviction moratorium would simply extend the existing City of Los Angeles renter protection ordinance banning the eviction of tenants for COVID-19-related nonpayment of rent to include all tenants for the duration of the declared emergency plus 30 days. This temporary eviction moratorium should not have any long-term economic impact on the value of rental properties and would not defeat the investment-backed expectations of landlords, who are already subject to numerous limitations on the right to evict. Moreover, the character of the government action is precisely that of the “public program adjusting the burdens of economic life to promote the common good” that *Penn Central* explicitly states is unlikely to support the finding of a taking.

F. A temporary eviction moratorium is not unconstitutional under the Contracts Clause.

A temporary moratorium is also not an unconstitutional interference with existing contracts. The Contracts Clause of the Constitution prohibits only “a substantial impairment of a contractual relationship.”³⁷ Even a substantial impairment may be upheld if the state has a “significant and legitimate public purpose behind the regulation.”³⁸ Courts also assess whether the adjustment of the parties’ rights is reasonable and “appropriate to the public purpose” of the regulation but generally defer to state legislatures in making those determinations.³⁹ Since the end of the *Lochner* era, the Contract Clause has not been “read as a serious impediment to state social and economic legislation affecting private contracts.”⁴⁰

In determining whether a regulation constitutes a substantial impairment, “whether the industry the complaining party has entered has been regulated in the past” is an important consideration in determining whether a law operates as a substantial impairment of a contractual relationship. Because “the landlord-tenant relationship is, if nothing else, heavily regulated,” new laws regulating that relationship are subject to less scrutiny.⁴¹ Landlords have come to expect that the state legislature and local governments will enact laws that will affect their contractual relationship with tenants. In this case, in response to the COVID-19 pandemic, many policies have been adopted – between the Mayor’s Executive Orders, the City’s adopted existing tenant protection ordinances, the multiple executive orders

³⁴ *Colony Cove Props., LLC v. City of Carson*, 888 F.3d 445, 451 (9th Cir. 2018).

³⁵ *Andrus v. Allard*, 444 U.S. 51, 66 (1979).

³⁶ *Andrus* at 65.

³⁷ *Energy Reserves Group, Inc. v. Kansas Power and Light Co.*, 459 U.S. 400, 411 (1983).

³⁸ *Id.*; *United States Trust Co. v. New Jersey*, 431 U.S. 1 (1977) (holding that the elimination of unforeseen windfall profits is a legitimate state interest).

³⁹ *Id.* at 412.

⁴⁰ *Troy Ltd. v. Renna*, 727 F.2d 287, 295 (3d Cir. 1984) (citing *Home Bldg. & Loan Ass’n v. Blaisdell*, 290 U.S. 398 (1934) (holding two-year state moratorium on foreclosure of mortgages did not violate Contract Clause)).

⁴¹ *Id.* at 297-98 (holding law that “simply enlarge[d] the terms of a statutory tenancy” was not substantial impairment of contractual relationship).

from the Governor, and Judicial Council Order – that have significantly changed the terms of the contractual relationship landlords have with their tenants.

Additionally, emergency conditions giving rise to state regulation and the temporary nature of the proposed regulation cautions against finding a substantial impairment. In *Home Building & Loan Association v. Blaisdell*, the Supreme Court held that a two-year state moratorium on foreclosure of mortgages during the Great Depression did not violate the Contract Clause.⁴²

Finally, it is important to emphasize, the City has already affected existing lease agreements when it enacted the most recent emergency eviction ordinance, but those actions did not rise to the level of a Contracts Clause violation due to the extraordinary governmental interest involved. The proposal under CF 20-0407 is no different. Expansion of the existing policy similarly does not raise Contract Clause concerns, as the same underlying governmental interest would support the expansion.⁴³

G. Several other jurisdictions have enacted significantly stronger measures than what is currently in place for the city of Los Angeles.

Although Los Angeles has acted quickly, it has now fallen behind many other cities in terms of the breadth and depth of its emergency eviction protections. Several cities and counties across the state of California have already moved quickly and decisively to protect their residents by enacting the types of strong provisions proposed under CF 20-0404. Some jurisdictions, like Santa Monica and San Mateo County, have prohibited landlords from attempting to evict tenants by serving notices to vacate or proceeding with the unlawful detainer process. In these jurisdictions, officials have proactively prohibited actions to *start* unlawful detainer proceedings, instead of just providing a tenant a defense they can assert in a court proceeding. Other jurisdictions, like Oakland, have provided a complete affirmative defense for tenants who are served an unlawful detainer lawsuit, covering nearly all grounds for eviction, absent a public health necessity.

H. Prejudicial assumptions about tenant behavior have no place in the discussion on housing stability during a deadly global pandemic.

Any references to tenant behavior and activity are not relevant to the question of temporarily preventing evictions. Evictions are never the only recourse against illegal behavior, and the theoretical possibility of illegal behavior, for which other enforcement avenues remain open, is not a good reason to risk countless people losing their home during a health emergency, or during the crucial economic rebuilding period right after the health emergency ends. There is nothing in the proposed policy (CF 20-0404) preventing the enforcement of other generally applicable laws, but the policy does offer what is most needed right now - greater housing stability at a time when that has never been more important.

I. The City should ensure that there are penalties for violation of the eviction moratorium.

A violation of the city’s eviction moratorium does not just put one household’s housing at risk. It can have serious public health implications if households are forced out of their homes and are unable to shelter in place. Therefore, the City should act to deter violations of the moratorium by:

⁴² 290 U.S. 398, 447-48 (1934).

⁴³ See *West Coast Hotel Co. v. Parrish*, 300 U.S. 379 (1937) (finding that the Constitution permits restriction of “liberty of contract” by governmental action where such restriction protects the community, health and safety, or vulnerable groups.)

- Providing that any aggrieved party or the City may institute a civil proceeding for injunctive relief and/or actual, special, statutory and/or punitive damages for violations of the moratorium;
- Providing the court discretion to award a penalty between \$1000 and up to \$10,000 per violation depending on the severity of a case (similar to the City of Santa Monica);
- Providing the court discretion to award actual damages and punitive damages;
- Adding a separate civil penalty of up to \$5,000 for violations of the Anti-Tenant Harassment Ordinance committed against elderly or disabled tenants (as provided by the City of Santa Monica).
- Providing that the prevailing party shall be entitled to costs and reasonable attorneys' fees;

To ensure meaningful compliance on the ground, violations of the moratorium, and co-occurring harassment actions taken to avoid compliance with the current protections must be met with strong enforcement measures.

II. The City Council should approve agenda item 38 (CF 20-0409) to clarify that unpaid rent during the emergency period is not grounds for eviction later.

The economic impact of this crisis will reverberate well after the public health emergency ends. Without additional protections for the hundreds of thousands of renters who are losing income as a result of the precautions necessary to address the pandemic, we will see a devastating wave of eviction and resulting homelessness at the end of the 12-month repayment period. The City can prevent this, and protect public health, by prohibiting evictions based on nonpayment of rent due during the COVID-19 emergency, even after the declared emergency ends. Such an action would still permit landlords to collect unpaid rent through traditional contract actions, such as seeking a judgment in small claims court – but unpaid rent that became due during the emergency could not be the basis for an eviction.⁴⁴

The City has the ability to prohibit such evictions under its well-established power to limit the substantive grounds for eviction.⁴⁵ Oakland's eviction moratorium already prohibits evictions for nonpayment of rent that became due during the COVID-19 emergency.⁴⁶ Southgate and Maywood have also adopted ordinance preventing unpaid rent during the emergency from being grounds for eviction.

The reality is that many tenants, especially low-income tenants, already struggled to pay rent before the pandemic. Coming out of the pandemic, they will be faced with the double hit of months of back rent and unstable or no employment. For tenants that endure this difficult time and successfully pay their rent going forward once the emergency resolves, it would be patently unfair and serve no legitimate public policy to allow their eviction based on back rent accumulated during the current safer-at-home orders.

⁴⁴ *Bevill v. Zoura* (1994) 27 Cal. App. 4th 694, 697 (court confirming that if a landlord waits too long to pursue uncollected rent, “the landlord is limited to collecting such rent in an ordinary breach of contract action,” and not through the unlawful detainer process.).

⁴⁵ See *Fisher v. City of Berkeley*, 37 Cal. 3d 644, 707 (1984) (holding that a city may regulate the substantive grounds of eviction, even to the point of “effectively eliminat[ing]” a ground for eviction in state law.) See also *Birkenfeld v. City of Berkeley*, 17 Cal. 3d 129, 148-149 (1976).

⁴⁶ City of Oakland Ord. No. 13589 available at <https://oakland.legistar.com/View.ashx?M=F&ID=8248264&GUID=D997F421-01DB-4B31-83DF-63F972DE3A76>.

III. The City should pursue all available options under agenda item 37 (CF 20-0407) to secure a rent freeze on all rental units during the emergency.

A. The City should consider whether it has emergency powers to freeze rents for all rental units during the emergency.

The City has broad police powers and emergency powers pursuant to Government Code section 8634, as discussed above. Governor Newsom further elaborated on the scope of these powers through his Executive Order N-28-20, issued on March 16, 2020, in which he found that "...because homelessness can exacerbate vulnerability to COVID-19, California must take measures to preserve and increase housing security for Californians to protect public health; and...local jurisdictions, based on their particular needs, may therefore determine that additional measures to promote housing security and stability are necessary to protect public health or to mitigate the economic impacts of COVID-19."⁴⁷ A temporary rent freeze on non-RSO units is one such additional measure necessary to protect public health and forestall homelessness. Moreover, it merely impacts the timing, not the ability of landlords to impose rent increases. The delay in exercising the right to collect rent may be permissible in the context of an international public health emergency, and we urge the City Council to direct the City Attorney to consider this possibility.

B. The City should consider whether a *temporary* rent freeze conflicts with Costa Hawkins.

Costa-Hawkins generally preserves the rights of landlords to set tenants' initial residential rental rates.⁴⁸ Under normal circumstances, Costa-Hawkins also permits landlords to increase rents on certain types of units, including units constructed after 1995, subdivided interests in subdivisions, single family homes, and certain condominiums.⁴⁹

There are several arguments that the City should seriously consider in order to support a temporary rent freeze on non-RSO units under Costa Hawkins. A temporary rent freeze would not prohibit landlords from setting initial rental rates, and landlords eligible to impose unregulated rent increases would be able to do so after the emergency has been resolved. Therefore, a temporary rent freeze is arguably not the "strictest type of rent control" that Costa-Hawkins aimed to prevent. In addition, the City should consider whether a temporary rent freeze would prevent evictions for nonpayment of rent, and might therefore be permissible under Costa-Hawkins' savings clauses, which provides that Costa-Hawkins does not interfere with the City's right to regulate the grounds of eviction.⁵⁰ Tenants who could

⁴⁷ Cal. Exec. Order No. N-28-20 (Mar. 16, 2020), available at:

<https://www.gov.ca.gov/wpcontent/uploads/2020/03/3.16.20-Executive-Order.pdf>.

⁴⁸ A court is disinclined to find field preemption of "land use regulations of local concern" beyond express declaration of the Legislature to occupy the field. *City and County of San Francisco v. Post* (2018) 22 Cal.App.5th 121, 137.

⁴⁹ Cal. Const. art. XI, Sec. 7.

⁵⁰ Civil Code section 1954.53(e); Civil Code Section 1954.52(c). *See Action Apartment Assn., Inc. v. City of Santa Monica* (2007) 41 Cal.4th 1232, 1245 deeming Civil Code Section 1954.52(e) a savings clause. *See Mak v. City of Berkeley Rent Stabilization Board* (2015) 240 Cal.App.4th 60, 69 and *DeZerega v. Meggs* (2000) 83 Cal.App.4th 28, 40, as modified on denial of reh'g (Sept. 14, 2000), which refer to Civil Code Section 1954.53(e) and Civil Code Section 1954.52(c) interchangeably. The court in *DeZerega* provided Costa-Hawkins "explicitly disclaims any effect on the power of local governments to regulate evictions," citing Civ. Code Section 1954.52(c); *Bullard v. San Francisco Residential Rent Stabilization Bd.* (2003) 106 Cal.App.4th 488.

rely on their current rental rate remaining constant during this crisis would be better able to afford to remain in their homes with a temporary rent freeze. Because Costa Hawkins enacted vacancy decontrol, landlords already had an incentive to engage in pretextual evictions.⁵¹ Currently, landlords owning non-RSO units have an even more dangerous incentive to evict tenants to make up for lost income during the epidemic and impose prohibitive rent increases on current tenants.

These questions are important, given the magnitude of these crisis. The City should be solution-oriented and do everything in its power to forestall this wave of evictions by enacting a temporary rent freeze.

C. Neither a temporary rent freeze nor rent forgiveness violates the Takings Clause.

As described more fully in Section I.E., the government’s regulation of property in this context will constitute a taking of such property only if it is found to be “functionally equivalent” to a direct appropriation or ouster under the “essentially ad hoc” fact-specific inquiry described in the *Penn Central* case.⁵² A temporary rent freeze ordinance should not have any long-term economic impact on the values of the impacted properties, since any such impact would evaporate the moment the freeze was lifted. Moreover, a temporary restriction on increasing rents is sufficiently similar to (and in many cases may simply overlap with) the City’s Rent Stabilization Ordinance that it would not defeat the investment-backed expectations of affected property owners. It is also the type of “public program” that a *Penn Central* analysis would be unlikely to deem a taking.

Finally, a rent cancellation program would also not rise to the level of a taking because of their limited economic impact when compared to the overall value of the properties in question. Although under such a program landlords would not be entitled to collect rent for the duration of the emergency, they would still be able to borrow against their properties, sell their properties, improve them, and continue to benefit from their appreciation in value. Any temporary reduction in value due to such a rent forgiveness program would fall well short of the significant percentages required for the finding of a taking under longstanding case law. Finally, although this specific type of rent forgiveness program may not have been anticipated by the affected property owners, the landlord-tenant relationship is heavily regulated under local and state law and a temporary program limiting a landlord’s ability to collect rent during a public health crisis that requires people to stay in their homes cannot be said to be outside the realm of possibility of anticipated regulation.

D. If the City Council does not act, the Mayor should use his emergency authority to impose a rent freeze.

Given the unprecedented emergency, the City’s broad emergency powers, and the temporary nature of a rent freeze, the City Council should do everything in its power to expand a rent freeze to non-RSO units. To the extent that Mayoral action is needed, the City Council should indicate its support for such action with an ordinance or resolution urging the Mayor to expand a temporary rent freeze. To the extent state law remains a barrier, the Council should urge the Governor to suspend any laws preempting a rent freeze on non-RSO units. But we urge the City Council to pursue local action on a non-RSO rent freeze to the fullest extent possible, considering all the above analysis.

⁵¹ *Bullard v. San Francisco Residential Rent Stabilization Bd.* (2003) 106 Cal.App.4th 488, 492.

⁵² *Penn Cent. Transp. Co. v. New York City*, 438 U.S. 104, 124 (1978).

As set forth above, the City clearly has the power to enact more meaningful protections for tenants during this crisis – including a broader temporary moratorium, to clarify that unpaid rent cannot be the future basis for eviction, and to enact a broad temporary rent freeze. We are in a state of emergency, and the law permits these temporary actions to be taken to safeguard all residents of the City. Your actions now will literally save lives in this City, and allow people to stay safe at home, as intended. We urge you to act now to protect your residents.

Sincerely,

Doug Smith, Public Counsel
Craig Castellonet, Public Interest Law Project
Dianne Prado, Housing Equality & Advocacy Resource Team (HEART)
Greg Spiegel and Tai Glenn, Inner City Law Project
Elena Popp, Eviction Defense Network

Communication from Public

Name: Adam Gill

Date Submitted: 04/21/2020 11:20 PM

Council File No: 20-0407

Comments for Public Posting: I am an inhabitant of Los Angeles and I strongly support a rent increase freeze, including units not under the City's Rent Stabilization Ordinance.

Communication from Public

Name: Kaycee

Date Submitted: 04/21/2020 11:22 PM

Council File No: 20-0407

Comments for Public Posting: I urge you to instruct the City Attorney to draft an ordinance that prohibits rent increases during the COVID-19 emergency and 90 days afterwards. This is a minimal effort to protect renters during both a housing crisis and a pandemic that requires people to isolate in their homes. We MUST protect renters, not landlord's profits.

Communication from Public

Name: Sharon Brown

Date Submitted: 04/21/2020 08:51 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here:<https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Sharon Brown

Communication from Public

Name: Valerie Brown
Date Submitted: 04/21/2020 08:37 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/>

Communication from Public

Name: Nina Cruz

Date Submitted: 04/21/2020 08:31 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Nina Cruz Single Mother, Ally to the Underserved, Human Rights Advocate

Communication from Public

Name: Eduardo

Date Submitted: 04/21/2020 08:33 PM

Council File No: 20-0407

Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/> Please take swift action tomorrow! Sincerely, Eduardo Martinez cell 323-535-8511

Communication from Public

Name: Jessica Ruvalcaba
Date Submitted: 04/21/2020 08:22 PM
Council File No: 20-0407
Comments for Public Posting: Dear LA City Council, I am writing to you to express my support for the written comments submitted by Housing is a Human Right Director Rene Moya, which can be found here: <https://www.housinghumanright.org/letter-to-city-council/>
Please take swift action tomorrow! Sincerely, Jessica Ruvalcaba

Communication from Public

Name: Felisa Meier
Date Submitted: 04/21/2020 07:28 PM
Council File No: 20-0407
Comments for Public Posting: We must protect renters, both their safety and lives by continuing the renters freeze!