



*“Great Apartments Start Here!”*

Janet M. Gagnon  
Senior Vice President,  
Government Affairs &  
External Relations  
janet@aagla.org  
213.384.4131; Ext. 309

**Via Electronic Mail**

March 10, 2025

Hon. Mayor Nikki Perez, and  
Members of the Burbank City Council  
City Hall  
275 East Olive Avenue  
Burbank, California 91502

**Re: Anti-Harassment and Relocation Fees – Agenda Item N6**

Dear Hon. Mayor Perez and Members of the Burbank City Council:

The Apartment Association of Greater Los Angeles represents more than 10,000 housing providers throughout Southern California, including those within the City of Burbank. We have extensive experience with relocation ordinances as well as anti-harassment ordinances that we would like to share with you in this letter regarding the current draft ordinance.

**Anti-Harassment**

Anti-Harassment ordinances should be structured to prevent harassment of both renters and rental housing providers. Currently the draft ordinance is completely one-sided, which is both extremely unfair and unnecessary. A separate new ordinance could easily be created to protect all parties from wrongful harassment to provide equal protection under local law. In fact, Claremont is currently conducting outreach specifically to craft a local ordinance that will provide protection to renters and owners alike. We would urge the Burbank City Council to do similarly and conduct outreach to return with a mutually protective ordinance for adoption.

There are many provisions in the draft ordinance that already could be readily adapted to renters and rental housing providers, such as:

- Section 5 - Mistreatment likely to cause fear or provoke.

- Section 7 - Threats by word or gesture or physical harm.
- Section 10 - Taking action on untrue facts is equally applicable to renters filing false claims with the City for code violations that do not exist or filing frivolous lawsuits against the rental housing provider.
- Section 18 - Right to quiet enjoyment is equally applicable to rental housing owners or their agents that live onsite.

In addition, there are several provisions in the current language that are extremely problematic and will likely result in litigation with the City.

Sections 14 & 15 prohibit an owner from refusing to acknowledge or cash a rent check. However, it makes no reference to the right of an owner to refuse a check that is not for the full amount of rent owed. Thus, it needs to be revised to add necessary clarity and be in compliance with existing laws.

Section 3 intends to punish rental housing providers for failing to complete needed repairs. However, if the renter refuses to allow access, then no such repairs can be made. Thus, it is unduly burdensome, unworkable and must be revised.

Section 19 states “other acts or omissions” is a catch all provision that is extremely vague and does not provide adequate notice to the rental housing provider of what specific acts or omissions would be deemed in violation of the ordinance. As such, it should be removed in its entirety.

Given the multiple problems with the existing language and the entirely one-sided nature of this ordinance, it should be directed back to staff to conduct further outreach and return with a revised ordinance that provides equitable protection against wrongful harassment for all community members and not just renters.

### **Relocation Fees**

As for relocation fees, the proposed definition limiting an exemption to only cases of Owner Move-In is woefully insufficient to enable mom-and-pop owners to remain in business providing much needed naturally occurring housing. A small, independent owner has drastically fewer financial resources than a large corporation. As such, increased relocation fees are simply unsustainable and unmanageable by smaller owners.

An exemption must be crafted for all small owners for all No-Fault causes and can be easily achieved by referencing the existing state definition under Assembly Bill 1482, which states that “natural persons” are property owners that are not a corporation or limited liability company with a corporate member. Alternatively, the City Council should choose a specific number of units owned by a rental housing provider as the definition of a mom-and-pop owner. The Los Angeles County Board of Supervisors has recently defined small owners as those with 10 or fewer units. The Los



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Angeles City Council has defined small owners as 12 units or fewer for their small owner rental assistance fund. Claremont City Council has defined small owners as 20 units or fewer for their rental assistance fund and 9 units or fewer for their Just Cause ordinance. A clear definition must be adopted in order to provide a proper exemption and attempting to side step the issue by referencing only Owner Move-Ins will not have sufficient impact to keep existing multifamily owners in business providing much needed affordable housing.

Thank you for your time and consideration of these matters. Please feel free to reach out to me directly by telephone at (213) 384-4131; Ext. 309 or via electronic mail at [janet@aagla.org](mailto:janet@aagla.org).

Sincerely,

*Janet M. Gagnon*

Janet M. Gagnon, Esq.

CC: Daniel Yukelson, Executive Director, Apartment Association of Greater Los Angeles