APARTMENT ASSOCIATION OF GREATER LOS ANGELES

AAGLA

"Great Apartments Start Here!"

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October 27, 2025
Via Electronic Mail

Honorable Mayor Nikki Perez, and
Members of the Burbank City Council
Council Chamber
275 East Olive Avenue
Burbank, California 91502

Re: Agenda Item N1 - Rent Stabilization, Rental Registry, Substantial Remodels (a/k/a Renovation Evictions), Relocation Fees Expansion

Honorable Mayor Perez and Members of the Burbank City Council:

The Apartment Association of Greater Los Angeles (AAGLA) represents approximately 10,000 rental housing providers throughout Los Angeles, Ventura and San Bernardino counties, including many in Burbank. More than 80% of our membership are mom-and-pop owners with 20 or fewer units.

Contrary to the Libert Hill Foundation report, mom-and-pop owners are not limited to those with 4 or fewer units. In fact, there are many small housing providers that own a single property with 5, 10, 15 or even 20 units that built prior to 1980 and have incurred substantial costs for repairs and maintenance. These small owners with 5 or more units on a single parcel are also unable to obtain 30-year residential mortgages and must obtain commercial loans with maturities of 5 to 10 years that require they refinance at interest rates that are double the interest rates from only a few years ago.

Rental housing providers have also experienced rapid cost increases due to skyrocketing property insurance premiums, and increased costs of trash hauling, water and sewer, repairs (materials and labor), maintenance and interest rates that have more than doubled in recent years. Small owners have not yet recovered from the countywide COVID eviction moratoriums and the recent wildfire eviction moratorium that have resulted in huge amounts of unpaid, past due rent that is unlikely to ever be collected. To repeatedly talk about more policies that will only make things more difficult for smaller rental property owners to continue providing affordable housing for working families only causes more owners to seriously consider exiting the rental housing business by entertaining unsolicited buyout offers from corporations, institutional investors and developers for redevelopment as more luxury housing.

Burbank has already passed numerous additional restrictions over the past two years, including adding 5 new staff for the Housing Enforcement Unit. Yet the data shows that there are only a handful of renters that require such additional assistance at a cost of $650,000.

Rent Stabilization & Rental Registry

While there have been allegations regarding rent increases, we have seen little data presented by either the City or the Burbank Tenants Union to validate any of the existing rent increases. According to CoStar data, a leading national aggregator of residential and commercial properties, rent increases have remained low over the last 5 years with almost no increases during the past two years across all sizes of rental properties. Where are the renters experiencing increases anywhere close to the existing statewide limit of 8% for multifamily properties with certificates of occupancy prior to February 2, 1995?

As we know from other cities, creating a rent stabilization ordinance and rental registry is an extremely costly endeavor. According to the City's staff report, Burbank is already projecting a deficit of between $3 million and $4 million for fiscal year 2025-26. The cost of implementing any rent stabilization proposal will undoubtedly negatively impact many core City services. Therefore, it would be irresponsible for the City Council to even consider such a massively expensive new program without clear and convincing evidence that the existing statewide rent stabilization is substantially insufficient to address existing rent increases in Burbank.

Expanding Relocation Fees

The City Council has already increased relocation fees less than 18 months ago. What has changed in such a short time to warrant a further increase? Where is the data showing the impacts on any specific category of renters? Once again, BTU seems to be fear mongering in front of the City Council rather than presenting concrete data on who is being harmed and why additional action is needed at this time. Shame on the City for not collecting its own data on this issue prior to making it an issue for discussion at the meeting on Tuesday. The City Council must make decisions based on facts and not unsubstantiated accusations or anecdotes.

Relocation fees are only paid for No-Fault evictions typically resulting during times of financial distress for the current rental property owner. To now add more relocation fees merely forces more owners into selling their entire property rather than conducting needed major repairs. When existing owners sell, the likely new owner is a corporation or developer that will demolish the property and replace it with luxury housing as a far better return on investment. The end result will be that all existing renters will need to find new housing. It is far better for the city to pass policies to encourage existing small owners to stay in business providing needed affordable housing rather than ones adding additional costs.

In addition, as mentioned in the staff report, Glendale does have relocation fees for seniors and disabled persons, collectively "Qualified Tenants." However, the first requirement for all additional relocation fees is that the renter household qualifies as low-income. If Burbank chooses to follow a similar path, then it should also adopt this fundamental requirement for any additional relocation fees.

Substantial Remodels (a/k/a, Renovation Evictions)

Substantial remodels are already restricted under state law to only major system repairs or removal of hazardous materials that take longer than 30 days to complete and cannot be done safely with a renter remaining in place. Cosmetic improvements alone are strictly prohibited. As such, these repairs are absolutely essential for maintaining a building in a safe and habitable condition. These are substantial repairs that already entail significant costs for the rental housing provider for these primarily older properties that provide the most affordable housing for working families.

If the City prohibits property owners from removing the existing renters to conduct needed repairs, then such repairs cannot take place. Instead, the owners will be faced with the sole option of selling the property "as is" for demolition. As stated above, this means that the City will permanently lose affordable rental housing stock making it even more difficult to meet state housing element requirements as part of the Regional Housing Needs Assessment (RHNA).

Local Rental Assistance

Instead of pursuing any of these extremely damaging policies, it would be far more beneficial for the City Council to consider creating a local rental assistance program that can be directly targeted to renters facing sudden illness, injury or job loss. Such a program could be targeted to low-income renters currently struggling to pay their existing rent due to temporary financial stress. Such a program already existing in Claremont that could be readily modeled by Burbank.

In addition, Los Angeles County has created a new Emergency Rent Relief Program (ERRP) for renters countywide who have been negatively impacted by the wildfires and recent immigration enforcement activities. The ERRP will be up and running in December.

Thank you for your time and consideration. 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.

Sincerely,

Janet M. Gagnon

Janet M. Gagnon, Esq.

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