

Office of the Los Angeles City Attorney
Hydee Feldstein Soto

REPORT NO. **R25-0317**
June 20, 2025

REPORT RE:

**REVISED DRAFT ORDINANCE IN REFERENCE TO PREVIOUS REPORT
NO. R25-115 AMENDING SECTIONS 165.03, 165.07, AND 165.08 OF ARTICLE 5,
CHAPTER XVI OF THE LOS ANGELES MUNICIPAL CODE TO REMOVE
SUBSTANTIAL REMODELING AS GROUNDS FOR EVICTION UNDER THE JUST
CAUSE FOR EVICTION ORDINANCE, AMENDING THE REMEDIES AND
PENALTIES APPLICABLE FOR VIOLATIONS, AND INSTRUCTING THE RENT
ADJUSTMENT COMMISSION TO PROMULGATE RULES AND REGULATIONS FOR
THE PURPOSE OF REGULATING TEMPORARY AND PERMANENT RELOCATION
AGREEMENTS BETWEEN A LANDLORD AND TENANT CONCERNING
SUBSTANTIAL RENOVATION WORK**

The Honorable City Council
of the City of Los Angeles
Room 395, City Hall
200 North Spring Street
Los Angeles, California 90012

Council File No. 24-1225

Honorable Members:

This Office has prepared and now transmits for your consideration, approved as to form and legality, the enclosed draft ordinance. The draft ordinance amends Sections 165.03, 165.07 and 165.08 of Article 5, Chapter XVI of the Los Municipal Code to remove substantial renovation to real residential property as grounds for eviction under the Just Cause for Eviction Ordinance (JCO). This Office notes that the current moratorium on evictions based on substantial renovation under the JCO expires on August 1, 2025. The draft ordinance would also add remedies and penalties for violations. Finally, the draft ordinance would direct the Rent Adjustment Commission, with the Los Angeles Housing Department's assistance, to promulgate rules and

regulations to regulate voluntary agreements between landlords and tenants where the landlord wishes to undertake substantial renovations that would impact the habitability of the rental unit and the tenant is amenable to temporary or permanent relocation.

The revised draft ordinance includes an urgency clause. In order to adopt the revised draft ordinance with an urgency clause it must be passed by a three-fourths vote of the City Council pursuant to Charter Section 253.

CEQA Findings

This Office recommends that the City Council determine, based on the whole of the administrative record, that the adoption of this revised draft ordinance is exempt from the California Environmental Quality Act (CEQA) through Section 15061(b)(3) (common sense exemption) of the State CEQA Guidelines and Article II, Section 1 of the City CEQA Guidelines, and that none of the exceptions under CEQA Guidelines Section 15300.2 apply. If the City Council concurs with the CEQA analysis, it should adopt these CEQA determinations prior to or concurrent with its action on the ordinance. This Office also recommends that the City Council direct the Los Angeles Housing Department to file Notices of Exemption with the County Recorder's Office following the adoption of the ordinance.

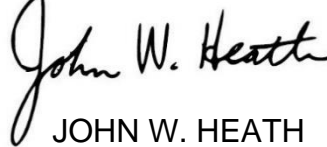
Council Rule 38 Referral

A copy of the draft ordinance was sent, pursuant to Council Rule 38, to the Los Angeles Housing Department, with a request that all comments, if any, be presented directly to the City Council or its Committees when this matter is considered.

If you have any questions regarding this matter, please contact Deputy City Attorney Peter Walford at (213) 922-8374. A member of this Office will be available when you consider this matter to answer questions you may have.

Sincerely,

HYDEE FELDSTEIN SOTO, City Attorney

By 

JOHN W. HEATH
Chief Assistant City Attorney

JWH:PW:ea
Transmittal