

## Communication from Public

**Name:** Fred Sutton  
**Date Submitted:** 11/19/2024 10:22 AM  
**Council File No:** 18-0610-S3  
**Comments for Public Posting:** Attached, please find a letter from the California Apartment Association regarding this matter.



California Apartment Association  
Los Angeles County

November 19, 2024

Chair Nithya Raman  
Housing & Homelessness Committee  
City of Los Angeles  
VIA Email

**Re: Item 9- Right to Counsel ([C.F. 18-0610-S3](#))**

The California Apartment Association (CAA), representing a broad range of housing providers and industry partners, is dedicated to promoting fair and equitable housing policies in the City of Los Angeles. We appreciate the committee and council's efforts to designate the Los Angeles Housing Department as the official repository and creator of notices for the City's Right to Counsel Program (RTCP Notice). Standardized notices are essential for clarity and consistency.

We would like to raise a practical concern regarding the noticing requirements outlined in Sec. 166.03(B), which states: *"If the tenant's primary language is not known or a translation of the RTCP Notice in the tenant's primary language is not available from the Department's website, the landlord shall provide the tenant with a copy of the RTCP Notice in English plus a copy of each RTCP Notice translated and made available in the languages included in Tiers 1, 2, and 3 of the CIFD's Language Access Plan (LAP)."*

The Language Access Plan includes 14 languages. Since many operators may not know a tenant's primary language, this could potentially require the distribution of up to 15 versions of the form, which could complicate communication rather than facilitate it.

**Recommendation:** We suggest streamlining this process by consolidating the notice into a single form that includes key information in multiple and desired languages and directs residents to a city website for more information and details. This approach would simplify compliance, reduce confusion, and ensure a consistent, easily accessible notice for all parties.

We respectfully request this aspect be reviewed to ensure a clear and efficient communication process that benefits both housing providers and tenants. Thank you for your consideration.

Sincerely,

Fred Sutton  
California Apartment Association