
DRAFT MEMORANDUM

To: Honorable Mayor and Council, City of Beverly Hills
From: HR&A Advisors, Inc.
Date: July 26, 2018
Re: No-Cause Eviction Policies in the Beverly Hills Rent Stabilization Context

The City of Beverly Hills (the “City” or “Beverly Hills”) retained HR&A Advisors, Inc. (“HR&A”) to provide independent research and analysis about seven policy issues related to recently enacted changes to the City’s Rent Stabilization Ordinance (the “RSO”).¹ This Issue Paper addresses whether, and if so how, the City Council might consider amending the RSO or other sections of the City’s Municipal Code to adjust the procedures and remedies for “no-cause” evictions. The term no-cause eviction refers to involuntary termination of a month-to-month residential tenancy for which no cause or reason is cited by the housing provider.

The Issue Paper begins with a general statement about the issue as it has arisen in the context of the RSO, describes the City’s current policies on no-cause evictions, highlights related positions mentioned in public discussions about the RSO Amendments, and summarizes how this issue is addressed by 13 other California cities with rent regulation, based on a review of their ordinances and regulations and through discussions with several of those cities’ representatives. The Issue Paper then presents data from various sources that have a bearing on the issue, including The Eviction Lab at Princeton University and a data file prepared by the Beverly Hills Unified School District (“BHUSD”) for rent-stabilized households with children enrolled in BHUSD. Based on the information and data provided on this topic, the Issue Paper concludes with a set of plausible policy options for City Council, City staff, and public consideration.

Statement of the Issue

The process of enacting the RSO Amendments has caused the City Council and City stakeholders to further evaluate RSO policy on no-cause evictions for Chapter 5 and Chapter 6 Tenants.

- No-cause evictions are involuntary terminations of tenancies for which no reason for eviction is stated by the housing provider.
- In contrast, “just-cause” evictions are involuntary terminations of tenancies for reasons established under California Code of Civil Procedure² or the terms of the RSO. Just-cause evictions include both

¹ Ordinance Number 17-O-2729, adopted in April of 2017 (the “RSO Amendments”). The City’s Rent Stabilization Ordinance (the “RSO”) regulations are included in Beverly Hills Municipal Code (“BHMC”) Title 4, Chapter 5 (“Chapter 5”) and Chapter 6 (“Chapter 6”). Tenants residing in RSO units subject to regulation under Chapter 5 are hereinafter referred to as “Chapter 5 Tenants;” and Tenants residing in RSO units subject to regulation under Chapter 6 are hereinafter referred to as “Chapter 6 Tenants.”

² Calif. Code of Civil Procedure, Sec. 1161.

“at-fault” evictions and “no-fault” evictions, which generally have different noticing and procedural requirements.

- ✓ At-fault evictions are evictions for which the tenant is culpable and a specific legal reason is provided (e.g., failure to pay rent, maintenance of a nuisance, illegal uses, failure to execute a lease, refusal to provide unit access, or unapproved subtenants).³
- ✓ No-fault evictions are evictions for which the tenant is not culpable and a specific legal reason is provided (a decision by owners to move themselves and/or an immediate family member into a given rental unit, the withdrawal of units from the rental market pursuant to the Ellis Act,⁴ conversion of apartment units to condominiums, or relocation necessitated by building renovation or demolition.)⁵

During a series of professionally-facilitated dialogue sessions between Beverly Hills housing providers and tenants living in buildings subject to the RSO following adoption of the 2017 RSO Amendments, tenants articulated a collective position to eliminate no-cause evictions, based on the following views:⁶

- Allowing no-cause evictions creates an atmosphere of fear in the resident base;
- The potential for no-cause evictions discourages tenants from reporting unsanitary or substandard dwelling unit conditions;
- No-cause evictions are used by some housing providers as a more procedurally convenient substitute for just-cause evictions;
- No-cause evictions contravene City Council interest in supporting residential stability;
- No-cause evictions pose potential harm to families with children in public schools;
- No-cause evictions pose potential harm to families for whom finding replacement housing in Beverly Hills is a challenge, given the very limited number of suitable units and the high demand for such units;
- No-cause evictions should be eliminated entirely, because there is no justifiable basis on which to allow housing providers to terminate tenancies capriciously or for any reason other than for-cause (i.e. through due process); and
- While federal law bans housing discrimination, no-cause evictions enable housing providers to effectively discriminate on any basis.

Housing providers articulated a collective position to preserve no-cause evictions, for the following reasons:⁷

- No-cause evictions provide landlords a fair, economical, and efficient manner to terminate problem tenants; and
- No-cause evictions also benefit adversely affected tenants who want a disruptive tenant removed.

³ Beverly Hills Municipal Code (“BHMC”), Title 4, Chapter 5, Article 5, Section 4-5-501 through Section 4-5-508.

⁴ BHMC, Title 4, Chapter 5, Article 5, Sec. 4-5-513.

⁵ BHMC, Title 4, Chapter 5, Article 5, Sec. 4-5-509; Sec. 4-5-511; and Sec. 4-5-512; and Chapter 6, Sec. 4-6-9.

⁶ City of Beverly Hills Human Services Division Memorandum, “Rent Stabilization Update,” September 28, 2017, Attachment 1, p.23-24.

http://beverlyhills.granicus.com/MetaViewer.php?view_id=40&clip_id=5787&meta_id=344485

⁷ Ibid.

However, housing providers also agreed that there need to be adequate no-cause eviction safeguards and limits to protect both tenants and landlords, such as:⁸

- A formula for the number of times no-cause evictions can be used within a specified period;
- Payment of reasonable relocation fees for no-cause evictions, including:
 - ✓ A limit to the number of times a tenant can receive relocation fees;
 - ✓ Financial criteria for a tenant to receive relocation fees; and
- The filing of a simple form with the City to enable the City to accumulate data regarding the frequency with which housing providers use no-cause evictions, and to ensure compliance with any applicable ordinance.

There is currently significant momentum in California to mitigate the adverse impacts of the statewide housing shortage and protect residents from the threat of displacement, including citizen initiatives to enact rent control in additional cities and/or enact new tenant protection ordinances, and proposed new laws in the State Legislature. With regards to no-cause evictions, in February 2018, a California Assembly Bill was proposed to prohibit rental owners statewide from terminating tenancies except for cause. The Bill was ultimately defeated in May 2018, but garnered considerable public attention and support.⁹

The Current Beverly Hills Context

Under the California Civil Code, no-cause evictions are legal for month-to-month tenancies in California unless local law states otherwise.¹⁰ State law allows local jurisdictions to enact ordinances to regulate no-cause evictions (“Just-Cause Ordinances”). Just-Cause Ordinances preclude housing providers from evicting tenants from rent-stabilized units for no stated cause, and require specific reasons for initiating eviction proceedings against a tenant. In jurisdictions without Just-Cause Ordinances, housing providers can terminate month-to-month tenancies without a stated cause with prior written notice.

The RSO Amendments continue to prohibit no-cause evictions for Chapter 5 Tenants, but Chapter 6 generally does not address no-cause evictions in detail, other than requiring housing providers to pay relocation fees to evicted tenants and requiring housing providers to file a copy of a No-Cause Termination Notice (a required 60-day notice under State law for no-cause evictions) with the City within one week of noticing the tenant.

Additionally, if a housing provider re-rents a unit that was involuntarily vacated due to a no-cause eviction, the unit must be rented to the new tenant at the same price that the prior tenant paid. Pursuant to BHMC Section 4-6-5, housing providers may only increase rents to market rate for units that are voluntarily vacated or involuntarily vacated for the at-fault reasons stated in BHMC Section 4-6-5 (e.g., failure to pay lawful rent, lease terms violations, maintenance of a nuisance, illegal uses, failure to execute lease, refusal to provide unit access, and unapproved subtenants.)

Comparison with Other Cities in California

As of June 2018, Beverly Hills (per RSO Chapter 6) is one of only two California cities among 14 with a residential rent regulation program that allows no-cause evictions of tenants from rent-stabilized units (the

⁸ Ibid.

⁹ AB2925 (Bonta). https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB2925

¹⁰ California Civil Code 1946.1.

other is the Town of Los Gatos). All other California cities with rent regulation programs have a Just-Cause Ordinance prohibiting no-cause evictions from rent regulated units.

Just-Cause Ordinances

Because Just-Cause Ordinances are not subject to Costa-Hawkins Rental Housing Act limitations,¹¹ they can either be implemented in connection with a city's rent regulation laws, barring no-cause evictions only from regulated units, or as a stand-alone ordinance barring no-cause evictions from units throughout the local rental market.¹² Just-Cause Ordinances may provide additional protections for certain types of tenants, such as persons with disabilities, elderly, terminally ill, families with school children and households with school employees.

Just-Cause Ordinances typically limit evictions to only a specific list of at-fault and no-fault reasons, and require the specific reason to be specified in the eviction notice provided to tenants and filed with the city, such as:

- Nonpayment of lawful rent;
- Material or habitual lease violation;
- Damage to the apartment;
- Refusal to sign a new lease agreement;
- Nuisance behavior;
- Refusing access to the apartment;
- Unapproved holdover subtenant;
- Capital improvements to the respective structure;
- Substantial rehabilitation to the respective structure;
- Sale of a unit that has been converted to a condominium;
- Ellis Act Removal¹³;
- Owner move-in, or move-in of an immediate family member;
- Order to vacate by the Department of Housing and Urban Development; and
- Government-ordered vacation of an unpermitted apartment.

Comparative Approaches to Just-Cause Ordinances

Six cities (Berkeley, Hayward, Los Angeles, Oakland, Palm Springs, and San Francisco) have implemented Just-Cause Ordinances for units covered under their respective rent regulation laws, whereas six others (East Palo Alto, Mountain View, Richmond, San Jose, Santa Monica and West Hollywood) have implemented standalone Just-Cause Ordinances applicable to all rental units, regardless of whether the rents are also regulated, as shown in Figure 1 (Beverly Hills Chapter 6 and Los Gatos do not have just-cause municipal code provisions or ordinances).

¹¹ Costa-Hawkins Rental Housing Act establishes that certain units must be exempt from local rent control laws, including units with certificates of occupancy issued after February 1, 1995. Proposition 10 on the November 2018 statewide ballot proposes to repeal the Act.

¹² Just-Cause laws are also referred to as Good-Cause Laws in Berkeley and San Francisco.

¹³ The Ellis Act, California Government Code Chapter 12.75, is a California state law that allows housing providers to evict tenants when removing units from the rental market. The Ellis Act is discussed in a separate HR&A Issue Paper.

Figure 1: Summary of California Rent Stabilization Programs with Just-Cause Laws, 2018

City	Just-Cause Ordinance Tied to Rent Regulation Ordinance	Just-Cause Ordinance Independent of Rent Regulation Ordinance
Beverly Hills (Ch. 5 only)	✓	
Berkeley	✓	
East Palo Alto		✓
Hayward	✓	
Los Angeles	✓	
Mountain View		✓
Oakland	✓	
Palm Springs	✓	
Richmond		✓
San Jose		✓
San Francisco	✓	
Santa Monica		✓
West Hollywood		✓
Percentage	54%	46%

Source: HR&A Advisors, Inc. and the individual cities

Cities with rent regulation programs have coupled rent level protections with Just-Cause Ordinances to more effectively promote stability for tenants covered under their system of regulations. Just-Cause Ordinances are intended to guard against abuse of the no-cause provision to vacate rent-stabilized units for the purpose of re-leasing units at market-rate rents, while preserving housing providers’ legal rights to maintain rental properties, evict problem tenants and/or exercise other rights.¹⁴

Cities with standalone just-cause ordinances bar no-cause evictions for all units in the local rental market with few exemptions.¹⁵ Cities that have considered standalone Just-Cause Ordinances that cover tenancies throughout the rental market have done so not only with the intention to protect a broader population of renters from arbitrary evictions, but also to simplify local laws and eliminate a two-tier system of tenant protections.¹⁶ This approach also preserves no-cause eviction protections should local rent regulation be repealed in the future.

Several cities with rent regulations have reconsidered or amended their policies on no-cause evictions in recent years. In May 2017, San Jose enacted a new standalone Tenant-Protection Ordinance (“TPO”) barring no-cause evictions. San Jose was the last of the Northern California cities with rent regulations to bar

¹⁴ Los Angeles County Rental Market Analysis and Policy Development Framework, 21-September-2017.

¹⁵ Exemptions to citywide just-cause laws vary, but may include: properties with three or fewer units, Section 8 units, care facilities, resident-owned nonprofit housing, and transient occupancy units.

¹⁶ Andrew Khouri, “LA City Council takes first step to make evictions harder,” *Los Angeles Times*, 28-June-2017; <http://www.latimes.com/business/la-fi-eviction-protections-20170626-story.html>

no-cause evictions. San Jose officials said the policy change was spurred by reports of more than 2,400 no-cause evictions in San Jose between 2010 and 2017.¹⁷

San Jose's TPO was contentious and continues to face protest from housing providers. As in Beverly Hills, San Jose housing providers argue that the just-cause provision limits their ability to manage properties and earn returns on investments in a very expensive housing market. San Jose housing providers also said that when seeking to evict a tenant for certain just-cause reasons, they are required to provide proof of nuisance behavior. They said that when dealing with problem tenants, issuing a no-cause eviction is a safer and more efficient process.¹⁸

The City of Los Angeles also began exploring policies to implement a Just-Cause Ordinance independent of the city's RSO in 2017.¹⁹

It should be noted, however, that a Just-Cause Ordinance regulating evictions, in the absence of rent regulation, can still lead to involuntary tenant displacement if rents are increased to an unaffordable level.

Eviction Data

Detailed eviction data for Beverly Hills is not available. However, the Eviction Lab at Princeton University collected, cleaned, geocoded, aggregated, and publicized all recorded court-ordered evictions between 2000 and 2016 in the United States. These data are useful for understanding the prevalence of evictions in general in Beverly Hills as compared with nearby cities and the region. But, it should be noted that because the dataset includes only court-ordered evictions, it does not capture evictions that do not result in a legal proceeding. Also, most cities nationwide do not require housing providers to state a reason when filing an eviction, the dataset does not track the relative occurrence of just-cause and no-cause evictions. Furthermore, the Eviction Lab *Methodology Report* notes that the eviction totals for California jurisdictions are probably understated, because "In California, many cases that end in eviction are sealed and therefore not accessible by the general public. In addition, it can be difficult to collect data from California as a whole, owing to restrictions on the number of records one can collect."²⁰

Eviction rates in this database are defined as the number of evictions per 100 renter-occupied households annually. With the above data limitations in mind, Figure 2 shows that Beverly Hills had a somewhat higher overall eviction rate in 2016 (0.54%, including a total of 48 evicted households) than any of the nearby cities of Santa Monica, West Hollywood, and Los Angeles, but about the same rate as in Los Angeles County as a whole.²¹ As shown in Figure 3, the annual eviction rate in Beverly Hills since 2000 has generally been on par with that of West Hollywood, but the rates in both cities have been higher than in Santa Monica. While eviction rates for the City and County of Los Angeles have fallen steeply by about 2.5 percentage points since 2000, according to these data, Beverly Hills eviction rates have fluctuated year to year and

¹⁷ Ramona Giwargis "San Jose City Council approves policy against no-cause evictions," *The Mercury News*, 19-April-2017; <https://www.mercurynews.com/2017/04/18/san-jose-city-council-hears-emotional-testimony-ahead-of-rent-protection-vote/>

¹⁸ Ramona Giwargis, "San Jose City Council approves historic new renter protections," *The Mercury News*, 21-April-2017; <https://www.mercurynews.com/2017/04/19/san-jose-city-council-approves-historic-new-renter-protections/>

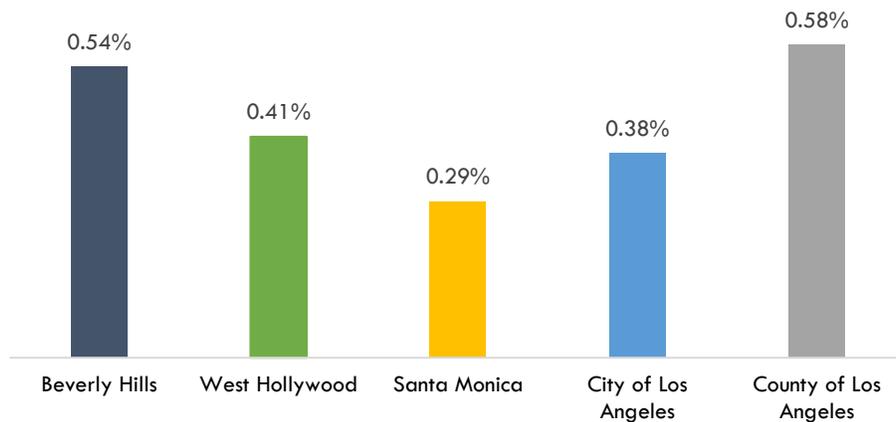
¹⁹ Andrew Khouri, "LA City Council takes first step to make evictions harder," *Los Angeles Times*, 28-June-2017; <http://www.latimes.com/business/la-fi-eviction-protections-20170626-story.html>

²⁰ *Eviction Lab Methodology Report: Version 1.0.*, Princeton: Princeton University, 2018, p.39, www.evictionlab.org/methods.

²¹ Eviction Lab National Database: Version 1.0. Princeton: Princeton University, 2018, www.evictionlab.org.

declined only slightly, by about 0.5 percent, since 2000. As of 2016, the eviction rates in these jurisdictions have converged to about the same level, with Santa Monica consistently showing the lowest eviction rate over this period.

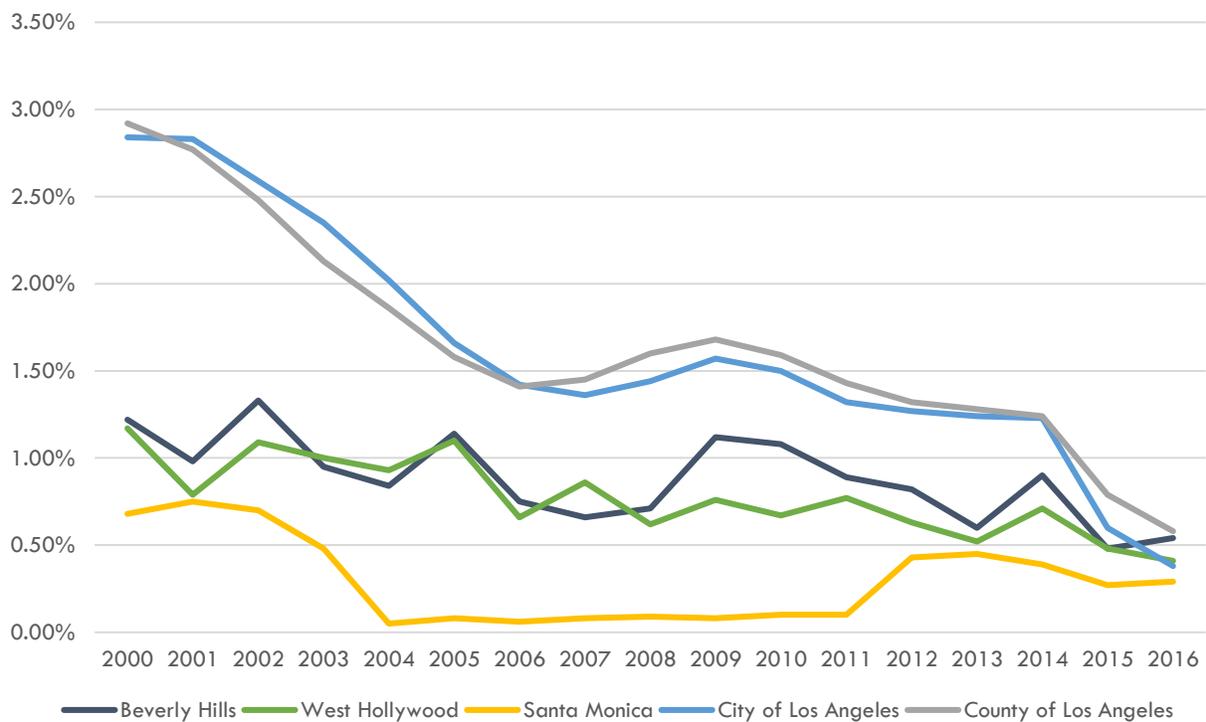
Figure 2: Comparison of Eviction Rates* with Nearby Cities and L.A. County, 2016



* An eviction rate is the number of evictions per 100 renter-occupied households

Source: The Eviction Lab at Princeton University and HR&A Advisors

Figure 3: Comparison of Beverly Hills Eviction Rates with Nearby Cities and L.A. County, 2000-2016



Source: The Eviction Lab at Princeton University and HR&A Advisors

Although there is no evidence to suggest that tighter eviction regulations cause reductions in the eviction rate, it is noteworthy that the cities of West Hollywood and Santa Monica have generally stronger eviction

regulations, and generally lower eviction rates, than Beverly Hills. More specifically, West Hollywood and Santa Monica have Just-Cause Ordinances preventing no-cause evictions throughout their entire rental markets. Additionally, Santa Monica further tightened eviction regulations in 2018 with an ordinance protecting educators and families with children under the age of 18 from all types of no-fault eviction during the school year.²²

Regulating Evictions of Families with Children and Educators

A key concern raised by Beverly Hills tenants in the facilitated dialogue sessions on no-cause evictions was the need to protect families with children in local public schools.

There are 1,107 RSO households with over 1,700 students attending schools in the BHUSD as of May 2018, according to BHUSD data analyzed by HR&A.²³ The data further indicate that approximately 42 percent of the total BHUSD student population resides in rent-stabilized housing.

In addition to the Santa Monica ordinance noted above that protects educators and families with children under the age of 18 from all types of no-fault evictions during the school year, San Francisco and Berkeley have also both enacted similar ordinances.

When the City and County of San Francisco first approved its ordinance in 2016, San Francisco City Council presented studies with findings that low- and middle-income households displaced by no-fault evictions often could not afford to remain in San Francisco. A San Francisco City Councilmember said that local studies “overwhelmingly demonstrate[d] that moving homes in the middle of a school year can be harmful for children; school teachers and other staff tend to be especially vulnerable to displacement due to salary limitations; and mid-year evictions of school staff disrupt relationships that are important to children, interfere with the learning process, and burden our schools.”²⁴ Berkeley voters also decided to amend that city’s RSO in 2016 to eliminate owner move-in evictions of families with children during the school year.

San Francisco’s ordinance was upheld by the California Court of Appeal in 2018, which led the Santa Monica City Council to introduce the same ordinance. Santa Monica City Council approved the ordinance in May 2018, saying of the new protection: “Education disruption brings immense challenges to young children and families if they are evicted or if their teacher faces eviction. This ordinance aligns with the City’s values and commitment to tenant rights as well as our strategic goals to maintain an inclusive and diverse community.”²⁵

Moreover, the eviction of tenants with children has been studied as a major contributing cause of family homelessness in the United States. A study by the Los Angeles Mayor’s Office for the United States

²² Constance Farrell, “Santa Monica City Council Approves Ordinance to Enhance Tenant Protections for Educators and Students Facing No-Fault Evictions,” *Santa Monica Daily Press*, 14-May-2018; <http://smdp.com/santa-monica-city-council-approves-ordinance-to-enhance-tenant-protections-for-educators-and-students-facing-no-fault-evictions/166138>

²³ HR&A analysis of enrolled student data provided by BHUSD and RSO Registry data.

²⁴ 20 Cal. App. 5th 510 (2018).

²⁵ Constance Farrell, “Santa Monica City Council Approves Ordinance to Enhance Tenant Protections for Educators and Students Facing No-Fault Evictions,” *Santa Monica Daily Press*, 14-May-2018; <http://smdp.com/santa-monica-city-council-approves-ordinance-to-enhance-tenant-protections-for-educators-and-students-facing-no-fault-evictions/166138>

Conference of Mayors in 2013, found that eviction was the primary cause of family homelessness in Los Angeles, followed by family disputes and poverty.²⁶

Policy Options for Beverly Hills

Based on the foregoing information and data, HR&A suggests that there are at least four plausible policy options that the City Council, City staff, and the public could consider when determining whether, and if so how, to address no-cause evictions (and recognizing that some options can be combined, such as #2 and #3):

1. **No Policy Change:** In this case, the City would continue to prohibit no-cause evictions for Chapter 5 Tenants only and permit housing providers to evict Chapter 6 Tenants without a specific cause, but continue requiring them to pay relocation fees and file a copy of the eviction notice with the City, as now required by the RSO Amendments.
 - **Benefits to housing providers:** Under current requirements, Chapter 6 housing providers would retain the ability to evict any month-to-month tenant without a court order or other administrative process, and maintain the existing flexibility of the current eviction process.
 - **Disadvantages to housing providers:** Housing providers would continue to be required to pay relocation fees when terminating tenants without cause and cannot serve no-cause evictions on Chapter 5 Tenants. Relocation fees may prevent housing providers from evicting problem tenants not subject to just-cause eviction, or prove costly for recovering use of their units.
 - **Benefits to tenants:** Tenants would continue to be eligible for payment of relocation fees, which ensures some financial relief for Chapter 6 Tenants facing no-cause evictions. Chapter 5 Tenants would continue to be protected against just-cause evictions. Also, the current 60-day prior noticing requirement for tenants served with no-cause evictions provides more time than other forms of evictions to prepare to move households.
 - **Disadvantages to tenants:** The continued potential for no-cause evictions may discourage Chapter 6 Tenants from submitting maintenance requests and general complaints to housing providers for fear of retaliatory eviction, and may generally create an unpredictable and unstable housing atmosphere for Chapter 6 Tenants.

Administrative Considerations: No increase above current levels of City staff time or resources.

2. **Allow no-cause evictions for Chapter 5 and Chapter 6 tenancies, but continue to require relocation fees for no-cause evictions:**
 - **Benefits to housing providers:** Allowing no-cause evictions for Chapter 5 tenancies in addition to Chapter 6 tenancies would extend housing providers' ability to evict any month-to-month tenant without the obstacle or expense of a court or other cumbersome administrative process. This policy would contribute to regulatory consistency across Chapter 5 and Chapter 6.
 - **Disadvantages to housing providers:** Housing providers would be required to pay relocation fees to Chapter 5 Tenants in the case of no-cause evictions.

²⁶ The United States Conference of Mayors, *Hunger and Homelessness Survey: A Status Report on Hunger and Homelessness in America's Cities*, December 2013.

- **Benefits to tenants:** There are little to no benefits to tenants, except that Chapter 5 Tenants would become eligible for relocation fees for no-cause evictions.
- **Disadvantages to tenants:** The potential for no-cause evictions may discourage Chapter 5 and Chapter 6 Tenants from submitting maintenance requests and general complaints to housing providers for fear of retaliatory eviction, and may generally create an unpredictable and unstable housing atmosphere for residents of rent stabilized units. This option eliminates eviction protection for Chapter 5 Tenants.

Administrative Considerations: Potentially some increase in City staff time or other resources to mediate disputes about no-cause Chapter 5 evictions, which are currently prohibited.

3. Expand eviction protections for families and educators residing in Chapter 5 and Chapter 6 rent regulated units: Under this scenario, no-cause evictions and no-fault evictions would not be allowed during the school year for any rent regulated unit in which children and educators reside.

- **Benefits to housing providers:** Housing providers would retain the ability to evict tenants from these units during summer months when school is not in session. They would also retain the ability to evict tenants for at-fault reasons, including non-payment of rent and nuisance behavior.
- **Disadvantages to housing providers:** This option could limit housing providers' ability to evict tenants at specified times of the year.
- **Benefits to tenants:** This option would increase stability for all families in Beverly Hills by preventing the displacement of teachers mid-year, and in particular, would protect students living in rent regulated units by reducing absenteeism or mid-year school enrollment change.
- **Disadvantages to tenants:** Tenants would not be protected from evictions during the summer months and they would still be subject to certain types of just-cause evictions.

Administrative Considerations: Some increase in City staff time or other resources to draft and support enactment of the ordinance, and potentially to monitor and mediate any disputes about such evictions.

4. Enact a Just-Cause Ordinance for Chapter 6 Tenants and eliminate no-cause evictions for all units covered under the RSO:

- **Benefits to housing providers:** There are little to no benefits to housing providers, other than potentially creating more certainty in the eviction process, possibly reducing some housing provider-tenant conflicts associated with involuntary evictions, and eliminating any need to apply different standards for Chapter 5 and Chapter 6 tenants in the same building.
- **Disadvantages to housing providers:** Without a no-cause option for housing providers, eviction processes could be costly, time-consuming, and an administratively cumbersome legal process, potentially involving third parties.
- **Benefits to tenants:** A Just-Cause Ordinance would create more security of tenure for Chapter 6 Tenants.
- **Disadvantages to tenants:** There are little to no disadvantages to tenants, although housing providers may be more inclined to pursue other just-cause means of evicting tenants, such as invoking the Ellis Act to go out of the rental business.

Administrative Considerations: Additional staff time or other resources to research, draft and advise City Council about the enactment of a new Just-Cause Ordinance. Also, potential for some savings over current costs to monitor and mediate no-cause evictions that would no longer be permitted. Other costs or savings would depend on how the Ordinance's administrative procedures are drafted.

5. Enact a Just-Cause Ordinance for all rental units in the City:

- **Benefits to housing providers:** This would create a single set of just-cause eviction requirements for all housing providers, preventing a two-tier system that is only restrictive of housing providers of rent regulated units.
- **Disadvantages to housing providers:** Without a no-cause option for housing providers, eviction processes could be costly, time-consuming, and an administratively cumbersome legal process, potentially involving third parties.
- **Benefits to tenants:** This option would likely decrease the prevalence of evictions across the City, protecting tenants from capricious evictions.
- **Disadvantages to tenants:** There are little to no disadvantages to tenants, although housing providers may be more inclined to pursue other just-cause means of evicting tenants, such as invoking the Ellis Act to go out of the rental business.

Administrative Considerations: Additional staff time to research, draft and advise City Council about the enactment of a new Just-Cause Ordinance, and to monitor and enforce the Ordinance. Other costs or savings would depend on how the Ordinance's administrative procedures are drafted.