



*"Great Apartments Start Here!"*

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**Via Electronic Mail**

Los Angeles County Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

**RE: Implementing Eviction Defense and Prevention Services in Los Angeles County  
(Agenda Item 11)**

Dear Board of Supervisors;

This letter is written to express the Apartment Association of Greater Los Angeles' (AAGLA) comments and recommendations regarding the County's proposed Eviction Defense and Prevention Services Program. We appreciate the Board's consideration and inclusion of some of AAGLA's previous recommendations on this program relative to limiting eligibility to low-income renters, inclusion of outreach and education, short term rental assistance and case management. There are several outstanding issues that we request the Board consider and direct staff to incorporate as part of the overall program implementation.

Evictions are not a desirable outcome for renters nor rental property owners. As outlined in the report submitted by the County of Los Angeles Department of Consumer and Business Affairs (DCBA), there are a multitude of negative consequences to renters following any eviction, including but not limited to, reduced credit score, difficulty securing new housing and potential homelessness. It is equally important to recognize that rental housing providers are in the business of providing people with homes and filling vacancies as efficiently as feasible, and not engaging in the eviction process. Evictions run counter to good rental business practice, as they are costly and often result in lost rental income, incurring cost of rehabilitation of the vacant rental unit, marketing the unit for rent, and the associated legal fees and expenses which can cost anywhere from \$15,000 to up to \$50,000 for contested eviction matters. The fact that evictions are a last resort is further illustrated by data in the DCBA report referencing unlawful detainer filings from Los Angeles Superior Court, noting that "unlawful detainer filings have trended downward since 2008." The best solution for all the involved parties is to avoid the eviction process entirely.

With more than 70% of evictions occurring due to non-payment of rent, the most impactful

way to immediately reduce evictions is through rent subsidies coupled with supportive services. We commend the County for including short-term rental assistance as part of the program and support the DCBA report’s recommendation of up to three months of assistance, including first and last month’s rent and a security deposit for new housing. We urge the Board to allocate a significant portion of funding to such financial support coupled with case management services, so that eligible renters are provided with both immediate and long-term assistance that is customized to their situation whether it be a recent job loss, a need for financial literacy, or catastrophic health issue.

Regarding the full legal representation component of the program, we urge the Board to institute a more targeted approach that focuses and prioritizes on illegal evictions that involve such factors as habitability, harassment or discrimination. As noted in the DCBA report, the Shriver Civil Counsel pilot program limits full legal representation to litigants that have an active unlawful detainer case where the opposing party is represented by legal counsel, and the case is deemed to be meritorious or with identified vulnerabilities.

Cases based solely on non-payment of rent should be directed to rental assistance and wraparound supportive services which will enable the individual to stay in their home, not a likely outcome through legal representation. Further highlighted by the DCBA report’s reference to Shriver stating, “at the end of their court cases, 22% of clients were able to remain in their homes.” Further noting that “about two-thirds of cases were resolved by settlement.” What is important to recognize is that most settlements still result in the renter vacating the unit. If the Board’s goal is to keep renters in their homes, increasing case settlements will have only a minimal and temporary impact.

As stated previously, legal representation should be provided to both eligible low-income renters and rental property owners. Small, “Mom and Pop” owners generally do not have unlimited resources to hire an attorney and would be placed at an unfair disadvantage if the renter is the only party afforded free legal representation. This rationale seems to have been acknowledged in the establishment of the Shriver program’s eligibility criteria, requiring that the individual be facing a litigant represented by legal counsel.

As the County advances the program and establishes contracts with legal services providers, we urge the Board to institute safeguards to minimize the opportunity for unethical legal practices geared to prolong the eviction process and compel unjustified settlements. The program should advance a more effective and efficient eviction process, establish maximum time limits on cases, limit extensions and allow but not mandate jury trials.

AAGLA has repeatedly supported the establishment of a comprehensive program that focuses on homelessness prevention and addresses illegal evictions. Of equal importance, any program that is advanced must be a balanced one that does not further impede an already overburdened court system and that does not increase costs and risks for rental housing providers. To that end, the County’s Eviction Defense and Prevention Services program should be available to both low-income renters and rental property owners and outreach and education should provide renters and owners with information regarding their rights and responsibilities. The recent adoption



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of numerous housing ordinances and related regulations necessitate that the County continually advance education and outreach services to both renters and rental property owners. Small property owners, many of whom are retirees, seek to comply with all the requirements but often struggle to navigate the system and fear the consequences of an unintended mistake. New owners must also have access to educational services as they are often unaware of all their newly acquired legal obligations.

We commend Board Supervisors for implementing the program in phases and within targeted geographic areas which will facilitate measurable indicators of program success and deficiencies. At the end of each phase, key stakeholders, inclusive of rental property owners and renters should be given an opportunity to provide feedback on the issues identified. Additionally, throughout the roll out period, the County should engage with stakeholders and convene meetings at regular intervals to review and address strengths and weaknesses in the program.

Thank you for your consideration of AAGLA’s concerns and recommendations as you move towards implementation of eviction defense services in Los Angeles County. If you have any questions, please call me at (213) 384-4131; Ext. 309 or contact me via electronic mail at [danielle@aagla.org](mailto:danielle@aagla.org).

Very truly yours,

Danielle Leidner-Peretz