

IMPORTANT INFORMATION

WHEN FILING A NOTICE OF INTENT TO WITHDRAW UNITS FROM THE RENTAL MARKET

This document is intended to provide information about the implementation of the requirements for (1) tenant relocation assistance payments, (2) notices to tenants and (3) other tenant protections when tenants are displaced for the purpose of removing the unit from the rental market and/or for the purpose of demolition for new construction. To obtain legal advice, please consult with an attorney.

Background Regarding Relocation Assistance Laws

Los Angeles City property owners are generally required to pay relocation assistance to their tenants to terminate tenancies in order to redevelop property or if withdrawing the unit from the rental market. If a tenant is entitled to relocation assistance because of City action or any provision of local, state, or federal law, then those benefits are credited against any fee required to be paid to the tenant under the City's Rent Stabilization Ordinance (RSO) or Just Cause Ordinance (JCO) found in the Los Angeles Municipal Code (LAMC). The relocation assistance must comply with both California law and the LAMC, and be the **greater** of the required relocation amounts, but not both amounts cumulative.

The Housing Crisis Act (HCA), Cal. Gov't Code §§ 66300 *et seq.*, declared a statewide crisis to address California's affordable housing shortage, strengthen tenant protections, and preserve existing affordable housing. To codify the HCA's requirements for local governments, the City adopted the Resident Protections Ordinance (RPO) (L.A. Ord. 188,481) on February 11, 2025, which reflects the City's effort to balance housing production and housing preservation. The RPO expands certain renter protections and requirements for affordable housing units specified under the HCA.

In general, both the HCA and RPO prohibit the City from approving any development project requiring the demolition of housing units unless certain requirements are met. The HCA requires that owners pay "lower income" (*Low, Very Low, Extremely Low*) tenants relocation benefits that are "equivalent to the relocation benefits required to be paid by public entities pursuant to [the California Relocation Assistance Law]." (Cal. Gov't Code § 66300.6(b)(4)(A)).¹ The RPO, in part, sets forth multiple ways for owners to comply with the HCA's requirement for relocation assistance. (LAMC § 16.60.A.3.b.3).

¹ To learn more about the HCA, please see the Department of City Planning's website at <https://planning.lacity.gov/project-review/housing-crisis-act>, including the [Replacement Unit and Occupant Protections Fact Sheet](#).

Based on the interaction between state and local law, if an owner wishes to demolish rental units for a new development, then the RPO will apply to any development project vested on or after February 11, 2025. The HCA will otherwise apply if the development project vested between January 1, 2020 to February 10, 2025.

Relocation Assistance Requirements with No Demolition for New Construction

If an owner wishes to withdraw rental units and the reason is not to demolish the units for a new development project, then the RSO (LAMC § 151.00 *et seq.*) or JCO (LAMC § 165.00 *et seq.*) will apply. The RSO and JCO require relocation assistance payments complying with LAMC Sections 151.09.G and 165.06.D, respectively. The RSO or JCO relocation assistance amounts apply to all tenants who are displaced for the purpose of withdrawing the units from the rental market *whether or not the property will be redeveloped*. The RSO or JCO amounts also apply to tenants who are not “lower income” for properties that will be redeveloped. See Attachment 1- Chart A for the applicable RSO and JCO relocation amounts.

Relocation Assistance Requirements for New Developments Requiring Demolition

Property owners will need to understand whether their new development project falls under either the State’s HCA and the RSO/JCO or under the HCA, RSO/JCO, and RPO (*see chart below, “Applicable Relocation Assistance Law”*). The relocation amount paid to “lower income” tenants may be greater under the HCA and RPO than under the RSO or JCO. Therefore, for HCA and RPO projects, the owner should be aware that the RSO amounts are the minimum a tenant is entitled to receive, but that amount will increase if the tenants are considered “lower income” households.

Projects that are not subject to the RPO may still be subject to the HCA, which was effective January 1, 2020. To comply with the relocation requirements of HCA, it may be helpful for owners to voluntarily opt into the RPO’s “Standardized Payment” (RPO Option 1) that the City included in the RPO. (LAMC § 16.60.A.3.b.3.ii.). See Attachment 1 - Relocation Chart B. The “Standardized Payment” RPO Option 1 roughly replicates the relocation amounts required by the HCA, which are higher relocation amounts than those provided under the RSO or JCO. Using the “Standardized Payment” Option 1 amount could help simplify the relocation benefit determination and payment process for both the owner and the tenants.

If the development project is not subject to the RPO, but is subject to the HCA and the owner chooses not to opt into the RPO relocation process, then LAHD will require documentation showing the state relocation amounts that will be paid to the lower-income tenants. The owner may satisfy this obligation by hiring their own relocation consultant, which can prepare a relocation plan and determine the relocation amounts required under the HCA. This relocation plan and proof of relocation payment should be submitted to LAHD.

Applicable Relocation Assistance Law Depending on Construction & Vesting Dates (The greater amount from all applicable laws must be paid)					
Property Construction Date	Project Vesting Date	RPO	HCA	RSO	JCO
Pre-1978	January 1, 2020 - February 10, 2025		✓	✓	
Pre-1978	After February 10, 2025	✓	✓	✓	
Post-1978	January 1, 2020 to February 10, 2025		✓		✓
Post-1978	After February 10, 2025	✓	✓		✓

Relocation Assistance Determination Process

The City contracts with a relocation consultant, Interwest Consulting, that will issue a determination on the relocation amount under the RSO, JCO or under the RPO Option 1 if a development project is subject to the RPO and the tenant is “lower income.” The City’s relocation consultant will not issue determinations under other provisions of the RPO, nor will it issue relocation assistance determinations under the HCA. The City’s relocation consultant will also provide free rental listings to tenants, assistance with extended tenancy by providing information and a claim form, free transportation to view prospective rental units, and general information about the moving process. These services are funded by the relocation services fees paid by the owner at the time of filing necessary forms with LAHD.

The City’s relocation determination process uses the information reported by owners and tenants. Owners provide information in the withdrawal forms filed with LAHD. Owners are required to provide information known about their tenants’ income, disability status, or elderly status, and whether minor children reside in the unit. Owners may provide supporting documentation of their tenants’ relocation eligibility factors if they wish to do so.

The City’s consultant will initiate its process by contacting the tenants via the mail, phone number or email provided by the owner. If the tenant agrees that the information provided by the owner is accurate, then the tenant will not be required to provide supporting documents. If the tenant reports different answers than the owner, then the consultant will request supporting documentation from the tenant and give them approximately 30 days to respond, which may be extended under special circumstances. Examples of documentation that may be requested include government-issued identification; birth certificates for minor children; tax returns and W2s; employment verification form; or documentation confirming disability status such as a doctor’s note or Social Security Disability letter. Tenants who fail to provide income documentation will qualify for relocation assistance under the RSO or JCO, and not under the RPO.

The consultant will send determination letters to inform the parties of the required relocation assistance amounts. The tenant and owner have 15 days to appeal if they disagree with the determination. A timely appeal will include an administrative hearing before a Hearing Officer, who will review written evidence and any testimony provided under oath. Once the hearing is completed the parties will receive a written determination from the Hearing Officer. If the parties disagree with the Hearing Officer’s determination, they may pursue an appeal with the courts. For more information about the hearing process you may contact the Hearings Section of LAHD at lahd.gmhearings@lacity.org.

Demolition Permit Clearance Conditions

The City will not clear demolition permits if the owner fails to pay relocation assistance under the RSO, RPO, or HCA. Under the RPO, an owner may also be subject to a fine equal to three times the relocation benefit amount that would have been paid under the RPO or \$250,000 per displaced occupant household when owners fail to report their intended development plans for a property in withdrawal forms filed with LAHD. Furthermore, per LAMC § 16.60.A.6, an owner or any “beneficial owner” must not violate the City’s Tenant-Anti Harassment Ordinance (TAHO), which could also lead to withholding of permit clearances for all projects.

Notices and Extensions of Tenancy Under State and City Laws

Owners must comply with the notice requirements under the Ellis Act, RSO, RPO, and/or HCA. Owners may file a Notice of Intent to Withdraw RSO units at any time under the Ellis Act (Gov’t Code § 7060 *et seq.*). When the withdrawal of the units is not due to an intention to develop the property then the Ellis Act requires for RSO units a 120 day-notice and 1-year extensions for elderly or disabled tenants who have resided in the unit for at least 1 year. The withdrawal of JCO units requires 30, 60 or 90 day notices. However, both the HCA and RPO require that owners allow tenants to remain in their units up to six months before the start of construction activities. For example, if the notice to terminate requires tenants move out

by February 1, 2026 then the owner must start construction activities by August 1, 2026. Additionally, the RPO and HCA require that the project applicant give existing occupants a written notice of the planned demolition, the date the occupant must vacate, and the occupant's rights under the RPO and HCA. Notice shall be provided at least six months before the date the occupant must vacate.

Furthermore, if the landlord is required to give any RSO tenant a one-year extension under the Ellis Act, then the owner should consider giving every tenant the one-year extension to avoid a violation of the RPO or HCA. If the landlord believes the construction will begin more than one-year after the Ellis Act is filed then they should be aware that the RPO and HCA will require tenants to have a right to remain in their units until 6 months before the start of construction activities. Seek legal advice if the project timeline requires providing extensions beyond one year under the HCA or RPO to understand the Ellis Act implications for RSO units.

In sum, owners must provide the following notices to tenants when withdrawing units from the rental market or to demolish their properties (copies to LAHD):

<i>If one or more of the following statutes apply, give the longest required notification under applicable laws.</i>				
Notice to Tenant Required	HCA (Redevelopment)	RPO (Redevelopment)	RSO	JCO
30, 60 or 90 Notice				✓
120-Day Notice with E3 Form			✓	
Required 1-year extension notice			✓ (for those claiming elderly or disabled status)	
Optional extensions beyond 120 days for tenants who are not elderly or disabled.			✓	
6-month notice & notice of HCA and RPO rights	✓	✓		
Notice of extensions to comply with the RPO and HCA tenant right to remain in the unit up to 6 months before Start of Construction Activities (Declaration of Start of Construction)	✓	✓		

To execute extensions of tenancy, the property owner must also file notices with LAHD.

<i>If one or more of the following statutes apply, provide forms to LAHD.</i>				
Forms to LAHD Required	HCA (Redevelopment)	RPO (Redevelopment)	RSO	JCO
Declaration on Start of Construction Activities on Ellis File Date and at 3, 5, 6, 8 and 10 months after Ellis File Date.	✓	✓		
Form E5 for 1-year extensions due to disability or age under Ellis Act.			✓	
Form E6 for extensions beyond 120 days for non-disabled or non-elderly tenants.			✓	

All termination notices must be filed with LAHD within 3 business days from the date it is served on the tenant. Filing of the notice to terminate can be done online at <https://lahd.service-now.com/efs> or if mailed or delivered in person it must include the [LAHD Eviction Notice Filing Cover Sheet](https://housing.lacity.gov/eviction-notices) found at <https://housing.lacity.gov/eviction-notices>

Proof of Compliance with State and Local Laws Required

To comply with the relocation assistance and notice requirements, owners will be required to provide proof of the following:

1. Payment of relocation assistance:

Demolition permits will not be cleared and financial penalties may apply if the correct relocation amount is not paid. (See Demolition Permit Clearance Conditions section of this letter)

- a. If relocation is paid using an escrow account, provide escrow instructions to the tenants within 15 days after the service of the notice to terminate tenancy and provide copies to the tenants of any amendments to the instructions to reflect increases in relocation if applicable.
- b. Provide LAHD a copy of all escrow instructions and any amendments.
- c. If relocation is paid directly to the tenant (no escrow account) it must be within 15 days after serving the notice to terminate and proof of the payment must be provided to LAHD (examples: cancelled checks, wire transfers, etc.).
- d. If your project is not subject to the RPO, but is subject to the HCA then provide documentation establishing how you are complying with the HCA (examples: relocation plan prepared by your private consultant, proof of payment, etc.) or let us know if you wish for the LAHD Relocation Consultant to issue a determination based on the RPO option 1 amounts as a method to comply with the HCA.

2. Tenants' Right to Remain up to Six months Before the Start of Construction Activities:

The purpose of this right is to prevent premature displacement of tenants from their homes resulting in buildings that remain vacant for unnecessary periods of time and to prevent tenant displacement for projects that are never completed. Keeping this goal in mind, developers should have an understanding of their construction timeline. If the developer believes the start of construction will be more than 6 months after the tenants' move out date, then the developer should factor that into their timeline when filing the withdrawal forms with LAHD and initiating the termination of tenancy.

- a. If the developer believes that the start of construction activities will be more than six months after tenants are required to move out, then the HCA and RPO require that tenants be given more time. These extensions should be done in writing to the tenants with a copy to LAHD.
- b. The two forms required to be filed with LAHD for extensions related to the 6 months are:
 - i. For RSO or JCO units, a Declaration of Start of Construction Activities Anticipated Date (with a copy to the tenant) and
 - ii. For RSO units, a E6 "Notice to City of Extended Dates of Withdrawal" with a copy to the tenant. These forms are to be filed each time there is an extension.

It is crucial the landlord also notify the tenants in writing of the extensions.

- c. The owners should give tenants more than 6 months notice at the start of the withdrawal process (date owner files Ellis or JCO withdrawal forms) if they anticipate the start of construction will be more than 1 year (6 months notice + 6 months to start construction deadline) after they file the forms to withdraw units from the rental market for demolition.

For example, if the Ellis is filed on January 1, 2026, the move out date is July 1, 2026 and the start of construction activities is by or before December 31, 2026 then the owner is in compliance with the RPO and HCA requirement, but if the start of construction is delayed until January 31, 2027, then the owner must give tenants a one month extension to August 1, 2026.

3. Notice Requirement:

- a. Provide to LAHD a copy of all notices issued to tenants such as 6 month, 1 year extensions, and any additional extensions to comply with the HCA or RPO. This should include the notice to the tenants of their rights under the RPO and HCA and Ellis Act. The RPO and HCA notice should be prepared by the landlord. The Ellis packet contains the E3 form which provides Ellis related rights notice to tenants.

Additional Tenant Rights Under State and Local Laws After Tenant Move Out

1. The landlord must act in good faith to recover possession of the rental unit either to demolish the rental unit or to remove the rental unit permanently from rental housing use. See Good Faith Requirements in the [Rent Adjustment Commission Regulations \(RAC\) 610](#) at housing.lacity.org or call LAHD to obtain a copy.
2. Right of Return if demolition does not occur regardless of tenant income:
 - a. For projects subject to the RPO when demolition does not occur and the unit is back on the rental market, an existing occupant that was required to leave their unit shall be allowed to return to the same rental unit or a Comparable Unit at their prior rental rate if the demolition does not move forward and the property is returned to the rental market.
 - b. For projects subject only to the HCA (not the RPO), any existing occupants that were required to leave their units shall be allowed to return at their prior rental rate if the demolition does not proceed and the property is returned to the rental market.
 - c. If not an RPO or HCA project, but subject to the RSO, then tenants have a right to return under the Ellis Act provisions for 10 years after the withdrawal date. During the five-year period after the accommodations are withdrawn the initial re-rental rent amount is at the lawful rent in effect at the time any Notice of Intent to Withdraw the accommodations was filed with the Department, plus annual adjustments available under the RSO. See LAMC Section 151.26-151.27 B.

	Right to Return <i>If one or more of the following statutes apply:</i>			
Tenant Right	HCA (Redevelopment)	RPO (Redevelopment)	RSO (Ellis)	JCO
Right to Return if the demolition never happens and the units are re-rented	Yes, to the same unit	Yes, to the same unit or a Comparable Unit.	Yes, to the same unit for 10 years after Ellis withdrawal date.	No
Rent Rate Upon Returning to the undemolished property	The rent amount the displaced tenant was paying at the time of displacement.	The tenant may return to the same rental unit or a Comparable Unit at their prior rental rate.	If re-rented within 5 years, it is the rent amount the displaced tenant was paying at the time of displacement plus RSO annual allowable rent increases.	No

3. Right of First Refusal to the new building for tenants who are “lower income” households:

- a. For projects subject to the RPO, the owner shall provide to the existing occupants of any Protected Units who are displaced and that are “lower income” a right of first refusal for a deed-restricted Comparable Unit available in the new housing development affordable to the household at their prior rental rate or an Affordable Rent or an Affordable Housing Cost, whichever is lower.
- b. For projects subject only to the HCA (not subject to RPO), the owner must provide a right of first refusal for “lower income” tenants for a comparable unit available in the new housing development, or in any required replacement units associated with a new development that is not a housing development, affordable to the household at an Affordable Rent or an Affordable Housing Cost. Some exemptions may apply. See Government Code Section 66300.6(b)(4)(B).
- c. For projects not subject to the HCA or RPO and only subject to the RSO or JCO, there is no right of first refusal to the new building.
- d. For questions about the Right of First Refusal contact the LAHD Land Use Section at Lahd-landuse@lacity.org. Some exceptions may apply. See LAMC Section 16.60 A.3(b)(4)(i) and Government Code Section 66300.6(b)(4)(B).

	Right of First Refusal <i>If one or more of the following statutes apply:</i>			
	HCA (Redevelopment)	RPO (Redevelopment)	RSO (Ellis)	JCO
Right of 1st Refusal	Yes, only “lower income” tenants to a comparable unit or any required replacement units associated with the new development.	Yes, only “lower income” tenants to a deed-restricted Comparable Unit.	No	No
Rent Rate at the New Construction	Affordable to the household at an Affordable Rent or an Affordable Housing Cost.	Affordable to the household at the prior rental rate or an Affordable Rent or an Affordable Housing Cost, whichever is lower.	N/A	N/A

Documentation to prove compliance with the relocation requirements and notice requirements should be submitted at: Lahd.declarations@LACity.org OR LAHD (Landlord Declarations) 1910 Sunset Blvd, Suite 300, Los Angeles, CA 90026. Include your case number.

The content of this document and its attachments are general guidelines. If you wish to obtain legal advice, please contact an attorney.

Attachment 1 Relocation Charts

RSO or JCO Relocation: Non-RPO and Non-HCA

Chart A: Relocation Assistance Amounts
Effective July 1, 2025 through June 30, 2026

Tenant Household	Tenants with Less Than 3 Years	Tenants with Length of Tenancy of 3 or More Years Or Low Income at or below 80% AMI (Low Income)	Tenants Renting Units in Mom & Pop Properties (Only for owner or family occupancy evictions)	Single Family Dwelling owned by natural person (JCO only)
Eligible Household	\$10,650	\$13,950	\$10,200	One month's rent
Qualified Household	\$22,450	\$26,550	\$20,600	

Increases every July 1st.

RPO Relocation Option 1: Standardized Payment LAM 16.60 A.3(b)(3)(ii)

The owner must pay relocation benefits to the existing occupant(s) within 15 days after service of a notice to terminate tenancy, or, if no notice is served, then prior to or at the time the occupant(s) are displaced.

CHART B: Resident Protections Ordinance Standardized Payments
(Only for Low, Very Low and Extremely Low Income Households)
Effective July 1, 2025 through June 30, 2026 (Increases July 1st)

Household Type	Extremely Low Income	Very Low Income	Low Income	Above Low Income
Tenants Displaced by New Development	\$111,900	\$93,750	\$84,750	See Chart A (RSO or JCO amounts)

2025 HUD Income Limits	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Low (80 % AMI)	\$84,850	\$96,950	\$109,050	\$121,150	\$130,850	\$140,550	\$150,250	\$159,950
Very Low (50% AMI)	\$53,000	\$60,600	\$68,150	\$75,750	\$81,800	\$87,850	\$93,900	\$100,000
Extremely Low(30% AMI)	\$31,850	\$36,400	\$40,950	\$45,450	\$49,100	\$52,750	\$56,400	\$60,000

**Income levels are typically updated in April of each year by HUD.*

RPO Relocation Option 2: Comparable Replacement Unit (LAMC 16.60 A.3(b)(3)(i))

Before or at the time of serving a notice to terminate tenancy, or if no notice is served, before or when the occupant is displaced by a Development Project, provide a copy of a written lease signed by the occupant to LAHD, documenting that the existing occupant has access to a comparable replacement unit (as the term is used in California Government Code Section 7260) that is permanently affordable, consistent with the requirements stated in LAMC 16.60.A.3.(b)(3)(i).

RPO Relocation Option 3: Individualized Relocation Process Consistent with State Relocation Law. (LAMC 16.60 A.3(b)(3)(iii))

Before or when the owner serves a notice to terminate tenancy, or if no notice is served, then before or when the occupant is displaced by a project, the owner shall be subject to an individualized relocation process to determine and pay the amount of relocation equal to the amount paid by public entities under California Government Code Sections 7260-7277.

Attachment 2
Frequently Asked Questions
For Evictions Subsequent to Withdrawing the Units from the Rental Market

1) What relocation amount is a property owner required to pay tenants?

It depends. The RSO and JCO require relocation assistance in compliance with LAMC Section 151.09.G or 165.06. The RSO and JCO amounts apply to all tenants displaced for the purpose of withdrawing the units from the rental market regardless of whether the property will be demolished and developed. Also, the RSO and JCO amounts apply to tenants who are not “lower income” for properties that will be developed. (See [Relocation Bulletin A](#) at housing.lacity.org).

If a project is subject to the RPO and/or the HCA there are different relocation requirements for occupants of a protected unit. A landlord will need to understand if their project falls under the State’s HCA or under RPO. Regardless of which law applies to the project, the relocation amount paid to “lower income” tenants will typically be much greater under the HCA and RPO than under the RSO and JCO. (See [Relocation Bulletin B](#) at housing.lacity.org).

2) How does an owner confirm the vesting date of their project to determine the applicable law?

A Department of Building and Safety application was filed and fees paid per 13B.10 of Chapter 1A of the LAMC or a Department of City Planning (DCP) preliminary application was filed, fees paid and completed per the state Housing Crisis Act (form CP 13-4062), or a DCP entitlement application was filed for vesting zone changes, general plan amendments and subdivisions (application was deemed complete by the City Planning Department). To request a vesting confirmation form go to from the City Planning Department and request a HCA Vesting Preliminary Application https://planning.lacity.gov/odocument/b5ddef3a-6113-4511-9902-155d1809ce3a/Info_Sheet_-_HCA_Vesting_Preliminary_Application_1.12.2023.pdf

For questions about vesting contact the Planning Department (Planning.HCA@lacity.org).

3) What is the Start of Construction Activities Date?

Per LADBS [Information Bulletin P/GI 2023-016](#), the term “Start of Construction Activities” is understood to mean the call for the first inspection for any construction permit, such as for grading or foundation work related to the proposed Housing Development Project. These inspections are those that are defined in the Los Angeles Building Code LAMC section 91.108.5 (item 1) and 91.108.9 (starting with item 2).

4) Does a property owner have to pay both the RSO and RPO/HCA amounts to the tenant?

No. The owner only pays the ***greatest*** relocation amount applicable under any local, state or federal law.

5) Who makes the relocation amount determination?

The City hires a Relocation Consultant (Interwest Consulting Group, Inc) that will issue a determination on the relocation amount under the RSO, JCO or under the RPO option 1 if the project is subject to the RPO. The City’s relocation consultant does not issue determinations under the RPO relocation option 2 or option 3 nor do they issue relocation determinations under the HCA.

6) What relocation services are provided by the City’s Relocation Consultant?

Services provided are: relocation determination, free rental listings to tenants, assistance with extended tenancy, free transportation to prospective units and general information about the moving process. These

services are funded by the relocation services fees paid by the landlord at the time of filing the withdrawal forms with LAHD.

7) Can a property owner hire their own relocation consultant?

Yes. However, the City will utilize the City's relocation consultant for all RPO option 1 cases and for all RSO or JCO relocation determinations regardless of whether the owner hires their own relocation consultant. The landlord and tenant can collaborate with each other if they wish to do so prior to the withdrawal forms being filed with LAHD. However, a tenant cannot be forced to provide information to the owner or owner's consultant. The withdrawal forms provide the owner an opportunity to report the tenant's income and other relocation factors in the Tenant Information page. The owner may provide LAHD documentation obtained from the tenants to establish their eligibility for relocation assistance, but it is not required. Documents obtained by the owner will be forwarded to the City's Consultant for consideration and discussed with the tenant.

For RPO option 3, the owner must hire their own consultant which must be approved by LAHD. The owner will be asked to submit all relocation documents required by LAHD similar to publicly-financed projects, including but not limited to: a relocation plan; a resume and qualifications of the required relocation consultant; a completed relocation tenant rent roll; and a completed project summary assessment, obtain LAHD approval of the calculated relocation payment once tenant has identified replacement housing and documentation showing the tenant was paid the full relocation payment. Before filing with LAHD a Notice of Intent to Withdraw (RSO/Ellis) or Declaration of Intent to Evict (JCO) for the purpose of demolition, obtain LAHD's approval of all required relocation documents. If no LAHD approval is obtained for option 3, then the owner may still file the Notice of Intent to Withdraw (RSO/Ellis) or Declaration of Intent to Withdraw (JCO), but for relocation benefit purposes, must comply with either RPO options 1 or 2.

For HCA relocation determinations, the owner may hire their own consultant and provide the information listed above as evidence of compliance with the HCA. The owner's consultant should be aware of the City's RSO, JCO and RPO and the State's HCA relocation rules. Additionally, the owner's consultant should be familiar with the Tenant Harassment Ordinance (TAHO) to avoid allegations of harassment.

8) Is income self-certified by the tenant, or must it be verified with documents?

The City's Relocation Consultant requests that tenants provide supporting documentation to establish income if the owner reports their income is unknown or if the owner's report does not match the tenant's.

9) What documentation are tenants required to provide to the City's relocation consultant to establish their relocation eligibility?

Depending on the applicable relocation law, examples of documentation requested from tenants include government issued identification to establish elderly status, birth certificates of minor children, most current year tax returns and W2 or 1099 forms, doctor's letter or disability benefits letter to confirm disability or handicap status. Since income is crucial for RPO determinations, the tenants are required to provide tax returns or supplemental forms such as employment verification forms completed by the employer sent directly to the consultant, disability or unemployment verification letters, asset reporting or child custody or spousal support agreements. Tenants who fail to provide income documentation to the City's relocation consultant under option 1 will only qualify for relocation under the RSO or JCO rules and not the RPO.

10) How long do the tenants have to provide the income information once they've been noticed?

Generally, tenants have about 30 days after the City's relocation consultant initially contacts the tenant to provide documents. In some circumstances tenants could be provided an extension. The City's relocation

consultant will typically send out 2 letters and make two phone calls to the tenant to initiate communication. After the 30 days have expired and after the 4 contact attempts, a relocation determination will be issued taking into consideration only the information provided by the landlord in the withdrawal forms and any documentation that may have been submitted by the tenant during that time period.

11) Whose income is considered?

When income is a factor, the income for all adult occupants reported either by the owner or tenant in the unit is considered including roommates or subtenants.

12) Do you use gross income or net income? Are assets considered in any way?

Gross annual income is considered to be consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and HUD guidelines. Assets are considered only if they are income generating. If they are not income generating, then they are not income. For example, a savings account is not income, but the interest rate on a savings account is income.

13) What happens if the documents the tenants provide to the City's Relocation Consultant are not sufficient to establish low income under option 1 or if they do not provide any documentation and the owner did not report tenants as "lower income"?

If no documentation is provided by the tenant, the owner did not report the tenants to be "lower income" or if the documentation provided by the tenant is not sufficient to establish a "lower income" level then the relocation determination will be based on the RSO or JCO. The tenant will still have an opportunity to appeal the City's consultant's determination.

The City's consultant reviews the documentation and if there are inconsistencies in the documentation they can ask the tenant for corroborating evidence and can also find the tenant is not "lower income". If subsequently the income is determined not to have been accurately reported by the tenants, then the relocation determination may change based on the new documentation via an appeal process where the parties can testify in support of their case. The Hearing Officer can overturn relocation determinations issued by the City or the City's relocation consultant. Appeals must be filed within 15 days after the City's relocation consultant issues the determination. Any decision by the Hearing Officer can also be disputed in court by either the tenant or landlord.

14) If there is a dispute, what is the appeal process?

The parties have 15 days after the City's consultant sends the relocation determination to the parties to appeal the determination and request an administrative hearing. The parties may submit documentation to the Hearings Section. The documents submitted to the Hearings Section or the City's relocation consultant are a public record and parties could seek legal advice to understand confidentiality rights. Once a hearing is scheduled a Hearing Officer will review the documents and take testimony under oath. A written appeal determination is subsequently mailed to the parties. All parties have a right to seek judicial review if they disagree with the Hearing Officer's determination. For more information about the hearing process you may contact Lahd.gmhearings@lacity.org.

15) What is the impact of the City's Tenant-Anti Harassment Ordinance (TAHO) or the South Los Angeles Community Plan Implementation Overlay Ordinance (South CPIO)?

Both the [RPO](#) and the [South CPIO](#) contain provisions that could have consequences for the projects. Under both the RPO and the South CPIO, the City can withhold permit clearances or revoke demolition permits for illegal tenant harassment. For more information about TAHO go to <https://housing.lacity.gov/residents/tenant-anti-harassment>.

The information provided here does not, and is not intended to, constitute legal advice.

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Laws and guidelines are frequently amended. The LAHD recommends that you verify information in the event that new changes are not yet reflected in this publication.