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Just Cause Eviction Research Info Sheet

1) Determine which states and municipalities have some form of eviction control measures in place.

States:

- California (2020)
 - Tenant Protection Act of 2019
 - CC § 1946.2 (California Civil Code, Division 3: Obligations, Part 4: Obligations Arising from Particular Transactions, Title 5: Hiring, Chapter 2: Hiring of Real Property)
 - CC § 1947.12 → rent control prohibiting raising the annual rent more than the average cost of living for that locality plus 5%, up to 10 % max increase from prior rent
- New Hampshire (1985)
 - RSA § 540:2 (NH Revised Statutes Annotated, Title LV: Proceedings in Special Cases, Chapter 540: Actions Against Tenants, Section 2: Termination of Tenancy)
- New Jersey (2008)
 - Anti-Eviction Act
 - NJSA § 2A: 18-53 through 2A: 18-84 (NJ Statutes Annotated, Title 2A: Administration of Civil and Criminal Justice)
 - NJSA § 2A: 18-61.1 - Grounds for Removal of Tenants
 - NJSA § 2A: 18-61.3 - Causes for Eviction or Non-Renewal of Lease
- Oregon (2019)
 - ORS § 90.427 (Oregon Revised Statutes, Chapter 90: Residential Landlord and Tenant, Subsection on Landlord Remedies, Section 427: Termination of Tenancy without Tenant Cause)
- Massachusetts for foreclosed rental properties
 - MGL, Chapter 186A (Tenant Protections in Foreclosed Properties)
- Rhode Island for foreclosed rental properties
 - RIGL § 34-18-38.2 (Title 34: Property, Chapter 18: Residential Landlord and Tenant Act, Section 38.2: Just cause needed for eviction of foreclosed residential property tenants)
- New York is considering
 - “Good Cause Eviction” bill introduced in state senate, 2020
- Washington is considering
 - Introduced both in 2019 and 2020 legislative sessions

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Municipalities with JCE:

* The CA and OR municipalities included on this list had JCE ordinances prior to CA's 2020 statewide enactments.

- Berkeley, CA
- Beverly Hills, CA
- East Palo Alto, CA
- Emeryville, CA
- Glendale, CA
- Hayward, CA
- Los Angeles, CA
- Maywood, CA
- Mountain View, CA
- Oakland, CA
- Richmond, CA
- San Diego, CA
- San Francisco, CA
- San Jose, CA
- Santa Monica, CA
- Union City, CA
- West Hollywood, CA
- Washington, DC
- New York City
- Philadelphia, PA
- Auburn, WA
- Burien, WA
- Federal Way, WA
- Seattle, WA

2.1) Compare and contrast at least 3 state-wide JCE laws:

For reference, in addition to no-cause evictions, these causes are explicitly permissible under VT law:

- At-Fault:
 - Non-payment of rent
 - Breach of rental agreement
 - Criminal activity
 - Illegal drug activity
 - Acts that threaten health/safety of other tenants
- No-Fault:
 - Sale of property
 - Conversion to condominium
 - Owner-occupied property with shared common space(s)

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	California	Oregon	New Hampshire	New Jersey
Year Effective	2020 *sunsets 2030	2019	1985	1974
Name	Tenant Protection Act of 2019 or AB 1482	SB (Senate Bill) 608		NJ Anti-Eviction Act
Law	CC § 1946.2	ORS § 90.427	RSA § 540:2	NJ § 2A:61.1 & NJ § 2A:61.3
Just Causes (Tenant At-Fault)	<ul style="list-style-type: none"> * VT at-fault causes *refusal to move out after tenant provides notice to owner of termination of agreement *refusal to permit lawful entry 	<ul style="list-style-type: none"> * VT at-fault causes *non-payment of utility or service *violation of conditions particular to housing type, per state law 	<ul style="list-style-type: none"> * VT at-fault causes 	<ul style="list-style-type: none"> * VT at-fault causes *refusal to accept reasonable changes to terms of lease
Just Causes (Landlord-Based / No-Fault)	<ul style="list-style-type: none"> *removal of unit from housing market *significant repair/renovation *gov't or court notice to vacate for health/safety code *landlord or immediate family move-in 	<ul style="list-style-type: none"> *removal of unit from residential use *significant repair/renovation (making unsafe to live in) *sale to person who will move in *landlord or immediate family move-in 	<ul style="list-style-type: none"> *removal of unit from residential use (esp. due to safety concerns) *significant repair/renovation * "other good cause" which may include "any legitimate business or economic reason and need not be based on the action or inaction of the tenant" 	<ul style="list-style-type: none"> *removal of unit from residential use *gov't or court notice to vacate for health/safety code *removal of unit from rental market *conversion to condominiums
	California	Oregon	New Hampshire	New Jersey
Relocation Assistance for No-Fault?	1 month's rent - can be supplied as payment or by waiving last month's rent	1 month's rent - only applies to owners with 5+ units	N/A	only if displaced due to government action
Applicable To	1+ year(s) of tenancy at a unit	1+ year(s) of tenancy at a unit	Tenants of "restricted property" → all real property rented for	All residential, except...

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			residential purposes, except...	
Exemptions	<p>*rental units in an owner-occupied duplex</p> <p>*apartments < 15 years old</p> <p>*specialty / transient housing - hospitals, school dorms, gov't-sponsored affordable housing..</p>	*rental units in an owner-occupied duplex	<p>*rental units in an owner-occupied building containing 4 units or less</p> <p>*single-family houses when the owner doesn't own more than 3 of them</p>	<p>*rental units in an owner-occupied duplex</p> <p>*properties rented to transient or seasonal guests</p> <p>*units held in trust on behalf of immediate family members who are developmentally disabled and permanently occupying the unit</p>
Rent Increase Caps	<p>*can't increase rent > cost of living for the locality plus 5 %</p> <p>*max increase: 10% prior rent</p>	*can't increase rent > 7 % plus average inflation for the past year	N/A	N/A
	California	Oregon	New Hampshire	New Jersey

2.2) Compare and contrast 3 communities with JCE that have some characteristics similar to Burlington.

*all quantities approximate, estimated by the US Census Bureau

Characteristic <i>Burlington, VT</i>	Burien, WA	Philadelphia, PA	West Hollywood, CA
Population <i>42,819 people</i>	51,500 people	1,584,064 people	36,475 people
Median Household Income, 2014-2018 <i>\$50,324</i>	\$62,315	\$43,744	\$69,249
Median Gross Rent, 2014-2018 <i>\$1,177 / month</i>	\$1,182 / month	\$1,007 / month	\$1,582 / month

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Characteristic <i>(Burlington)</i>	Burien	Philadelphia, PA	West Hollywood, CA
Persons in Poverty <i>24.7 %</i>	13.6 %	24.9 %	13.0 %
> 5,000 College Students? <i>Yes</i>	No	Yes	No
Race and Ethnicity Demographics (using abbreviated versions of designations from the census) <i>Am. Indian: 0.3 %</i> <i>Asian: 6.3 %</i> <i>Black: 5.3 %</i> <i>Latino/Hispanic: 2.8%</i> <i>Multi: 2.7 %</i> <i>White: 82.9 %</i>	Am. Indian: 0.7 % Asian: 12.8 % Black: 8.0 % Latino/Hispanic: 24.6 % Multi: 7.2 % White: 48.3 %	Am. Indian: 0.4 % Asian: 7.2 % Black: 42.3 % Latino/Hispanic: 14.5 % Multi: 3.0 % White: 34.6 %	Am. Indian: 0.2 % Asian: 5.3 % Black: 3.6 % Latino/Hispanic: 10.7 % Multi: 5.3 % White: 75.8 %
JCE Ordinance	Just Cause Eviction Ordinance, Burien Municipal Code § 5.63.070	“Good Cause” Eviction Law - Fair Housing Ordinance, Philadelphia Code § 9-800	Rent Stabilization Ordinance, West Hollywood Municipal Code, § 17.52.010
Year Effective	2019	2018	1985
Just Causes (Tenant At-Fault)	*habitual non/late payment of rent *habitual violation of material terms of lease *illegal drug activity *criminal activity threatening health/safety of other tenants or owner *failure to comply with lawful notice to vacate *tenancy dependent on employment on the premises, which has since ended	*habitual non-/late payment of rent *violation of material terms of lease *substantial nuisance and/or unsafe activity *substantial damage to property *refuses lawful access *refuses to renew similar-terms lease *refuses to agree to changed lease, given certain conditions of change (per ordinance)	*non-payment of rent *violation of terms of tenancy *substantial nuisance, damage to property, and/or unsafe or illegal activity *refuses lawful access *refuses to renew similar-terms lease *subleasing w/o permission *tenancy dependent on employment on the premises, which has since ended
Just Causes (Landlord-Based / No-Fault)	*owner or immediate family move-in (only if no substantially equivalent	*owner or immediate family move-in	*owner or immediate family move-in (but

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	<p>unit is vacant in same building)</p> <ul style="list-style-type: none"> *substantial repair/renovations *sale of property *removal from residential use *demolition *order to vacate for health/safety *conversion to cooperative *in compliance with max. occupancy ordinances *owner wishes to cease sharing own housing unit with tenant 	<p>*temporary removal from market for significant repair/renovations (but tenant gets option to return when back on market)</p>	<p>must provide relocation assistance)</p> <ul style="list-style-type: none"> *owner wishes to transfer into that unit (w/ medical documentation) *substantial repair/renovations to comply with health/safety code (but tenant gets right of first refusal after) *removal from rental market *demolition by certain orgs. to construct low- and moderate-income housing *in compliance with laws on inclusionary housing units *foreclosure
Characteristic	Burien, WA	Philadelphia, PA	West Hollywood, CA
Applicable To	All	Leases lasting < 1 year	All
Exemptions	N/A	N/A	N/A
Rent Caps	N/A, rent control is illegal In Washington	N/A	Max Allowable Rent (MAR) dependent on year began tenancy, as well as age and type of property.
Other	Burien's ordinance is modeled after Seattle's (1980)	Explicitly lists some of the things on the basis of which it would be unlawful for an owner to terminate/modify a lease	<p>Relocation assistance required when evicted for:</p> <ul style="list-style-type: none"> * owner/immediate family move-in * Renovations to meet code *foreclosure *withdrawal from rental market *demolition

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3.1 Identify the most common characteristics of JCE ordinances in jurisdictions without rent control or rent stabilization.

Those jurisdictions include:

- Burien, WA
- Emeryville, CA*
- Federal Way, WA
- Glendale, CA*
- Philadelphia, PA
- San Diego, CA*
- Seattle, WA
- Union City, CA*

*California now has a statewide “anti-gouging” law, enacted with JCE, but the language in these ordinances existed prior to that law.

All had variations of the following listed as just causes for eviction:

- Tenant’s non-payment of rent
- Tenant breach of rental agreement
- Tenant threat to others’ health/safety (often as some part of a “nuisance” clause in CA cities)
- Landlord / their immediate family moving in
- Property to receive significant repair/renovations

Other popular causes include:

- Property removed from rental market
- Property removed from housing market (most specifically for demolition)
- Tenant refusal to renew (nearly) identical lease
- Tenant’s activities regarding illegal/controlled substances
- Property conversion to condominium(s)

See excel sheet “JCE Causes by Jurisdiction.”

3.2 Special attention should be paid to ordinance provisions that prohibit excessive rent increases in jurisdictions without rent control.

Those prohibiting excessive increase:

- Berkeley, CA (7 % max)
- East Palo Alto, CA (10 % max)
- Hayward, CA (10 % max)
- San Francisco, CA (7 % max, can’t exceed a tenant’s base rent by > 60 % of published consumer price index increase)
 - Only applied to properties issued a certificate of occupancy before 1979
- Oregon (max. of inflation plus 7 %)

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- California (no more than the cost of living for the locality plus 5 %, maximum of 10 % increase over prior rent)
- New Jersey (unconscionable rent increases)
 - A court may consider the following to determine if a rent increase is unconscionable:
 - the amount of the proposed rent increase
 - the landlord's expenses and profitability
 - how the existing and proposed rent compare to rents charged at similar rental properties in the geographic area
 - the relative bargaining position of the parties
 - whether the rent increase would shock the conscience of a reasonable person, based on the judge's general knowledge

All had variations of the following listed as just causes for eviction:

- Tenant non-payment of rent
- Tenant breach of rental agreement
- Tenant threat to others' health/safety (often as some part of a "nuisance" clause in CA cities)
- Property removed from housing market (most specifically for demolition)

Other popular causes include:

- Tenant refusal to permit landlord's lawful entrance
- Landlord / their immediate family moving in
- Tenant refusal to renew (nearly) identical lease
- Tenant causes significant damage to property
- Property to receive significant repairs/renovation
- Tenant's illegal use of property
- Tenant's unpermitted subleasing
- Property removed from rental use

See excel sheet "JCE Causes by Jurisdiction."

3.3 Also, look at options that accommodate student-type rentals (roommates).

I did not notice any ordinances that differentiated roommates from other groups of renters when renting from private landlords, but below is some of the language I found regarding student housing. In California, JCE protections don't kick in until there's been one year of tenancy, but that clock restarts if a new roommate is brought in within the first two years of that group being largely the same.

Additionally, Erika Johnson (VT Legal Aid) noted that Burlington's Code of Ordinances defines "rental unit" to the exclusion of housing provided by educational institutions in terms of housing discrimination (Chapter 8, Article IV) and suggested piggybacking off that language.

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(This ordinance also exempts owner-occupied duplexes, which are forms of housing that some other jurisdictions exclude from their JCE laws.)

- Berkeley Municipal Code § 13.76.050:
 - “This chapter shall apply to all real property that is being rented or is available for rent for residential use in whole or in part, except for the following: ... (J.) A rental unit which is rented by a nonprofit, accredited institution of higher education to a tenant or tenants who are student(s), faculty, or staff of the institution or of a member school of the Graduate Theological Union, provided, however, that the institution owned the unit as of January 1, 1988.
- Burien Municipal Code § 5.63.020 (7):
 - “Landlord” means a landlord as defined in and within the scope of RCW [Revised Codes of Washington] 59.18.030 and 59.18.040 of the Residential Landlord Tenant Act of 1973”
 - 59.18.040 (1) → exempted from this chapter is “Residence at an institution, whether public or private, where residence is merely incidental to detention or the provision of medical, religious, educational, recreational, or similar services, including but not limited to correctional facilities, licensed nursing homes, monasteries and convents, and hospitals”
- California Civil Code § 1946.2 (e)(3):
 - “This section shall not apply to the following types of residential real properties or residential circumstances:... Dormitories owned and operated by an institution of higher education or a kindergarten and grades 1 to 12, inclusive, school.”
- Glendale Municipal Code § 9.30.020:
 - “The term ‘rental unit’ shall not include the following: rooms or accommodations in hotels (as defined in Section 4.32.020), boarding houses or lodging houses which are rented to transient guests for a period of less than thirty (30) consecutive days; housing accommodations in a hospital, convent, monastery, church, religious facility, extended care facility, asylum, nonprofit home for the aged; dormitories owned and operated by an institution of higher education, or a high school or elementary school...”
- West Hollywood Municipal Code § 17.24.010 (1)(a):
 - “The following shall be exempt from application of this title: Institutional Facilities. Housing accommodations in any hospital, convent, monastery, extended medical facility, asylum, nonprofit home for the aged, fraternity, or sorority house, or housing accommodations owned, operated, or managed by a bona fide educational institution for occupancy by its students.”

4. Identify best practices among jurisdictions with JCE ordinances/laws.

* I am writing this more as a “things to consider.”

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Informed by conversations with:

- Erika Johnson, VT Legal Aid
- Edmund Witter, managing attorney at King County (Washington) Bar Association's Housing Justice Project)
- Alison McIntosh, Director of the Oregon Housing Alliance
- Branden Butler, California Department of Fair Employment and Housing

Language Considerations

- Some jurisdictions write simpler JCE laws (CA, NH...) and others are much more detailed—especially in terms of procedure (Seattle...); Witter's not sure that it really matters which approach you take, but might want to consider how much procedure other housing ordinances and state law already lay out.
 - Butler (of CA), would argue that while CA law may not give as much procedure, it's still very easy to get lost in that law, and recommends writing it better so that anyone can understand it, not just lawyers
- Ought to include requirement for landlords to provide to tenants specific notice of what just cause they have to evict
 - Some jurisdictions require notice for only some of the causes and an opportunity to rectify, and those that do have varying lengths of notice
 - Another thing that may already be provided for in state law
- Pure lease expiration should not be a just cause → undermines the whole point
 - Seattle (1980 JCEO) includes this (Ed believes as an uncorrected drafting error) and then Burien (2019 JCEO) adopted it when copying and pasting Seattle's ordinance as its own
 - Otherwise, unwritten agreements better off, but then just incentivizes writing a short-term lease agreement then letting it expire to evict a tenant
 - If you don't include, some may argue that you're creating a contract in perpetuity, but that doesn't actually hold much water, constitutionally
- Will this be just a defense against eviction, or will it include proactive enforcement?
 - Most I've seen are purely defense
 - Costly to hire enforcement personnel, and that's more likely to sink an ordinance at the City Council level
 - When you don't have a body to enforce, it's left to lawyers and the courts, and Butler points out that it's almost no justice in that direction → it's a long process, and in CA, those courts are very landlord-friendly
 - McIntosh recommends being explicit about the statute of limitations, and preferably, giving tenants a year from when they could have reasonably known about a landlord's violation of JCE (as opposed to a year from being evicted)
 - Additionally, penalizing landlords financially if found to have violated JCE ordinance with, say, 3 months' worth of rent
- With at-fault causes, consider which violations the tenant might get an opportunity to cure and which permits immediate removal
- Mutual termination agreements

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- Often constitute a waiver of rights, JCE ordinance should provide some wiggle room to vacate such an ordinance for those who've landed in a really bad situation
- Limiting exemptions
 - Butler considers CA's law to be very watered down, in large part due to the number of exemptions. Some cities (like San Diego) close exemptions for single family homes, for example, by making JCEOs apply to them, but not until two years of tenancy has been reached (instead of one)
 - 2 year / 1 year tenancy may be longish, but still helps the long-term renters
 - Too many exemptions also makes it hard to be effective in communicating to the public what JCE does
 - With pure JCE (without rent control), Butler thinks it makes even more sense to limit exemptions
- Landlord/family move-in
 - These clauses tend to be the most wordy/detailed
 - More likely to require relocation assistance
 - A number of the ordinances I read won't allow for this if there is a vacant unit on the same property
 - Butler wonders if perhaps there should be a declaration required of the landlord, saying who exactly will be moving in as documentation in case of abuse
- Making the ordinance effective immediately avoids unsavory tactics landlords might employ in the time between passage and effective date

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