



February 19, 2026

The Honorable Chief Justice Patricia Guerrero
and Associate Justices
California Supreme Court
350 McAllister Street
San Francisco, CA 94102

RE: Amicus Letter in Support of Petition for Review of *California
Apartment Association et al. v. City of Pasadena et al.* (California
Supreme Court Case No. S295001)

Dear Chief Justice Guerrero and Associate Justices:

The undersigned organizations respectfully urge review of the Second
District Court of Appeal's decision striking down the rental relocation

assistance provision of a voter-approved amendment to the Pasadena City Charter.

I. Interests of Amici

Tenants Together is a non-profit organization that is dedicated to protecting the rights of California's tenants. Tenants Together trains tenants in their rights, supports the formation of tenant associations, and advocates at the state and local levels for legislation to protect tenants from displacement and mitigate the harms of California's housing crisis.

Long Beach Residents Empowered (LiBRE) is a grassroots organization committed to advancing justice in disadvantaged communities by creating and preserving affordable housing, renter protections, and community economic development. LiBRE strives to promote housing as a human right, to put an end to displacement and homelessness. This encompasses showing up for renters and their families who call Long Beach and neighborhoods across Los Angeles County their home.

The San Luis Obispo Tenants Union (SLOTU) has a direct interest in this case because San Luis Obispo faces the same housing crisis as Pasadena. Over 60% of residents rent, lack adequate protections under state law, and are at risk of displacement due to unaffordable rent increases. Rental relocation assistance is a critical policy tool that SLOTU advocates for to help keep our most vulnerable community members housed and prevent homelessness in our city. By supporting the reversal of the Court of Appeal's preemption decision, we stand in solidarity with Tenants Together and the voters of Pasadena to ensure that California cities have the legal authority to implement this proven protection for renters facing displacement.

The Santa Barbara Tenants Union (SBTU) is an all-volunteer, tenant-led union dedicated to defending tenants against unjust evictions, rent increases, and negligent landlords. Union members provide each other and other tenants education, solidarity, and mutual support in the fight to guarantee

housing as a human right. SBTU strongly supports rental relocation assistance for renters in Pasadena, Santa Barbara, and across California. As home ownership falls further out of reach for an increasing number of Californians and as the cost of rental housing continues to rise beyond what is affordable, renters need a safety net more than ever to mitigate the many uncertainties that accompany renting.

Tenants United Anaheim (TUA) is a volunteer-run, nonprofit community organization led by a union of residential tenants. TUA recognizes and supports relocation assistance as a crucial provision of ordinances across the state. TUA is currently working on passing tenant protections in Anaheim. A critical issue we strive to address is to mitigate the severe financial impact of displacement on tenants which poses threats to their public health, safety, and general welfare.

The Pasadena Tenants Union (PTU) is an organization dedicated to advancing tenant rights and protections in the City of Pasadena and beyond, including advocating for tenants collectively and supporting tenants in crisis individually. PTU is proud to have participated in the campaign for Measure H, and today we implore this honorable Court to consider restoring a provision that has kept many Pasadenans housed. As part of PTU's solidarity actions, PTU has supported many individuals who faced rent hike evictions, several of whom narrowly escaped homelessness or displacement thanks to relocation assistance. PTU urges this Court to save this crucial and crisis-averting protective tool.

East Bay Housing Organizations (EBHO) is a member-driven nonprofit organization that has represented a coalition of nonprofit housing developers, service providers, faith and advocacy groups, and low-income tenants and homeowners for over 40 years. In that time, we have consistently witnessed the destabilizing effects of rent hikes which displace residents from their homes. These effects take place at an individual level, with negative health and education outcomes, often leading to homelessness. These effects are seen at a community level, with disintegration of gentrified neighborhoods

and community networks and reinforcement of segregation. And the effects play out at a system-wide level, straining our already under-resourced housing support systems while making it that much harder to provide stable, affordable housing for all. For these reasons, we strongly support relocation assistance and protections for tenants facing destabilizing rent hikes.

Strategic Actions for a Just Economy (SAJE)'s vision is for a society where everyone has access to green space, reliable and safe transit, economic security, and healthy, secure and affordable housing, and where the elements of the built environment necessary to survival are publicly supported infrastructure and not commodities. We believe we can realize this vision by engaging all people, especially those who have been socially marginalized, in decisions about the fate of their city, regardless of their class, race, gender, or any social privileges.

The mission of the ACCE (Alliance of Californians for Community empowerment) Institute is to improve the lives of California's traditionally underserved residents, including communities of color, low-income and working families, and the undocumented population, by carrying out work that fosters deep, indigenous leadership development, policy creation, robust civic participation, and broad community empowerment. ACCE works with tenants to develop meaningful housing policy solutions that protect tenants and homeowners from real estate special interest greed.

The Regional Tenant Organizing Network (RTON) is an alliance of community-based organizations, tenant associations, and allies located in California's Bay Area, focused on advancing tenant rights priorities through running strategic tenant association campaigns. RTON believes that tenant associations and advancing tenant rights is crucial to address the issues in the housing market in California and continual displacement of low-income people and communities of color. RTON has seen how instrumental rent stabilization ordinances and protections have been to maintaining vibrant, diverse working-class communities of color in our region.

The Sonoma County Tenants Union (SCTU) builds tenant power through embedding anti-racist, pro-housing justice, and intersectional feminist principles in its work in solidarity with other movements for collective organizing. SCTU strives to achieve transformative change around housing rights, practices, and policies, and thus elevate the experiences, knowledge, and needs of low-income people of color, people with disabilities, trans and queer people, undocumented people, and unhoused people -- those victimized by the current systems.

The San Francisco Anti-Displacement Coalition (SFADC) is an alliance of tenant organizations fighting against the evictions and rent increases that have displaced thousands of San Franciscans and for a community-controlled housing system that works for all. SFADC is committed to building a democratic and inclusive movement for social change based on its core beliefs: that all tenants have a right to safe, secure, and affordable housing; that real estate speculation destabilizes neighborhoods and economies; that San Francisco's future as a culturally diverse, vibrant city depends on protecting tenants from displacement; and that organized tenants have the power to shape the present and the future of this city.

II. Why Review Should Be Granted

California is home to 187,000 unhoused individuals -- more than any other state in our country.¹ Housing instability and houselessness have long been linked in numerous studies to negative physical and mental health outcomes, poor school performance for children and increased crime.² Every city should

¹ Public Policy Institute of California, *Homelessness Hits Record High in California, Jumps Dramatically in Rest of US* (March 25, 2025), at <https://www.ppic.org/blog/homelessness-hits-record-high-in-california-jumps-dramatically-in-rest-of-us/>.

² See, e.g., Kushel et al., *Housing Instability and Food Insecurity as Barriers to Health Care Among Low-Income Americans* (January 2006) *Journal of General Internal Medicine*, vol. 21, No. 1, p. 71; Cutts et al., *U.S. Housing Insecurity and the Health of Very Young Children* (August 2011) *American*

have a legitimate governmental interest in stabilizing families and individuals in their housing. The State of California itself has, on many occasions, expressed a goal of minimizing displacement and homelessness.

The percentage of tenants who are rent-burdened is growing.³ As rents continue to rise out of proportion to incomes, the housing crisis worsens. As a result, cities in California have been devising ways of protecting tenants from displacement. They have done so since the 1970s. These kinds of protections are not unique to Pasadena. The Court of Appeal’s decision threatens housing security for tenants in cities across the state.

In 2022, the voters of Pasadena passed a ballot initiative known as Measure H, to protect tenants from displacement due to unreasonable rent increases, unjustified evictions, and harassment, which often leads to self-eviction. Measure H established rent control on properties that are not exempt under state law, as well as just cause eviction protections above state minimums.

The purpose of Measure H, now Article XVIII of the Pasadena City Charter, is stated as follows:

“The purpose of this Amendment is to promote neighborhood and community stability, healthy housing, and affordability for renters in Pasadena by regulating excessive rent increases and arbitrary evictions to the maximum extent permitted under California law, while ensuring Landlords a fair return on their investment and guaranteeing fair protections for renters, homeowners, and businesses.”

Journal of Public Health, vol. 101, No. 8, p. 1508; Wolstein et al., *California Adults Who Experience Housing Insecurity Also Experience Psychological Distress, With Few Seeking Mental Health Care* (July 2024) UCLA Center for Health Policy Research, pp. 6–7.

³ Vega Varela & Cohen, *The Origins of California’s Housing Crisis: Fifty Years of Rising Rental Housing Costs and Their Unequal Impacts on Californians* (June 2024) Gender Equity Policy Institute, p. 2, at <<https://doi.org/10.5281/zenodo.11094192>>.

Community stability is the goal of every aspect of Measure H. That includes the provision struck down by the Court of Appeal, which requires landlords to provide one-time relocation assistance to tenants who are displaced by excessive rent increases in units that are exempted from the City's rent increase limits.

When tenants are displaced due to no fault of their own, like due to a large, unpredictable rent increase, they face severe hurdles to finding new housing. The rent for a new place will almost certainly be higher than what they were previously paying, if they can find a place to rent at all. The cost of moving, the security deposit, and first month's rent for a new place is more than many families can manage. Tenants and the undersigned advocacy organizations are all too familiar with the experience of being forced to move and settling for a smaller, less well-maintained place that costs more rent and is a longer drive to work and school. The undersigned advocacy organizations work day in and day out to mitigate the negative impacts of displacement. We counsel tenants in crisis, raise and disburse rental assistance funds, provide legal aid when needed, and do overall case management.

The goal of relocation assistance in Pasadena and other California cities is to cushion the impact of displacement and prevent homelessness. The provision at issue here does not prevent anyone from raising rent on any unit. Yet it provides meaningful assistance to a tenant facing eviction for nonpayment of rent as a result of such an increase. A one-time relocation assistance payment does not eliminate the trauma of displacement. Many of the social impacts remain. But it does help a family land on their feet in safe housing. The assistance is designed to help with moving costs, security deposits, and other incidental costs associated with packing up one's house and relocating.

Relocation assistance is also designed to help the family adjust to what will inevitably be higher rent, which can be hundreds of dollars more per month. The one-time relocation assistance cannot permanently cover that increase, but even modest assistance can help families avoid homelessness.

The State of California shares this goal of community stability and homelessness prevention as evidenced by the Tenant Protection Act of 2019 and numerous other state laws designed to protect tenants from the excesses of the rental housing industry.

For these reasons and more, we ask the Court to grant review and make clear that relocation assistance is an available and important tool in California cities' arsenals as they seek to combat California's housing crisis and make housing more affordable.⁴

The Court of Appeal's determination that Measure H's relocation assistance provision is preempted by state law should be reversed.

⁴ As this Court pertinently observed in *California Building Industry Assn. v. City of San Jose* (2015) 61 Cal.4th 435, at page 441:

“It will come as no surprise to anyone familiar with California’s current housing market that the significant problems arising from a scarcity of affordable housing have not been solved over the past three decades. Rather, these problems have become more severe and have reached what might be described as epic proportions in many of the state’s localities.”

(See *id.* at p. 461 [holding that San Jose’s inclusionary housing ordinance, “[r]ather than being an exaction, . . . falls within what we have already described as municipalities’ general broad discretion to regulate the use of real property to serve the legitimate interests of the general public and the community at large”].)

Respectfully,



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