Exhibit 2. Comparison of TRAO Amendments and Current TRAO

Amended TRAO Section	Existing TRAO Section	Summary of Revisions
Division 1. General		Chapter 36 relocated to Chapter 46 Article II.
§ 46.2-1.10 Statement of Purpose § 46.2-1.15 Definitions	§ 36.38 Statement of Purpose § 36.38.15 Definitions	 Revised to clarify that relocation benefits apply for both temporary and permanent displacement. Definitions added for Affordable Rent, Comparable, Permanent Relocation, Substantial Rehabilitation, and Temporary Relocation. Definition of Relocation Assistance deleted, and concepts moved to § 46.2-1.20 (Permanent Relocation) and § 46.2-1.25 (Temporary Relocation). Definition of Displace or Displacement truncated and the provisions within that definition defining who is entitled to relocation assistance have been moved to Sections § 46.2-1.20 and § 46.2-1.25. Definition of Special Circumstances Households now includes low-income households. Definition of Rental Unit revised to eliminate exceptions for single-family homes. Singlefamily homes built before December 2016 are partially covered under the CSFRA with eviction protections. The CSFRA requires relocation assistance for all no-fault evictions. The changes to the definition of Rental Unit
§ 46.2-1.20 and § 46.2-1.25	§ 36.38.20	 make it consistent with the CSFRA. Existing TRAO does not differentiate between temporary versus permanent displacement. Now these Sections contain the eligibility for relocation and relocation assistance required to be provided for Permanent Relocation and Temporary Relocation
§ 46.2-1.20 Permanent Relocation	N/A	Now includes that tenants are eligible for relocation assistance when displaced as a result of a government order requiring the vacation of the rental unit – under the existing TRAO these tenants are not covered.

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§ 46.2-1.25 Temporary Relocation	N/A	 Tenants who are displaced as a result of fire, flood, earthquake or natural disaster not caused by the landlord are not eligible for relocation assistance. Relocation Assistance now includes moving costs per Council direction. Existing TRAO does not provide benefits for temporary relocation as a result of substantial rehabilitation of the rental unit. Entire Section
		is new.
§ 46.2-1.30 First Right of Return & First Right of Refusal	§ 36.38.30 First Right of Return	 § 36.38.30 currently addresses the right of tenants to return to existing rental units that were previously withdrawn from the rental market pursuant to Government Code § 7060 (Ellis Act). Existing Language does not clearly address the right of return required in the CSFRA for other no-fault evictions and does not completely conform with the Ellis Act. Addresses the right of return for all units from which a tenant is displaced. Now also include the right of first refusal on new replacement units as required by SB 330.
	Division 2	Relocation Procedures
§ 46.2-2.5	§ 36.38.25	
Displacement Related to Development and Building Permits	3 30.30.23	 Adds requirement for landlord to provide a "unit Inventory" as a part of a development application submittal. Compliance with right of first refusal provisions is condition of approval. Adds requirement for landlord to provide "Notice of Property Redevelopment" to tenants no later than one year prior to expected vacation (in compliance with SB 330).
§ 46.2-2.10 Relocation Assistance for No- Fault Terminations (Including Owner Move-Ins and Government Orders	§ 36.38.25.b	Per Council direction, now includes City action to red-tag a building due to unpermitted use or code violation.

§§ 46.2-2.15 - 46.2- 2.25 Ellis Act	§§ 36.38.30, 36.38.35, and 36.38.40	•	Updates the provisions in the current TRAO regarding Ellis Act evictions in rent-stabilized units to conform with Government Code § 7060 et seq. Miscellaneous
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§ 46.2-3.5	§ 36.38.25.c	•	Translations for those with limited English
Language			Proficiency.
Accessibility			
§ 46.2-3.10 Alternative Mitigation	§ 36.38.45	•	Current TRAO includes provision of comparable unit as an option under alternative mitigation, which must be requested. Amended TRAO includes "comparable unit" as a standard option for both temporary and permanent displacement and does not require alternative mitigation request.
§ 46.2-3.15 Administrative Regulations	§ 36.38.50	•	Minor clean-up to clarify language.
§ 46.2-3.20 Preservation of City's Authority to Provide Relocation Assistance	§ 36.38.55	•	Same
§ 46.2-3.25 Effect of Non- Compliance by Landlord	§ 36.38.60	•	Same