

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	§ 36.38 Statement of Purpose	Revised to clarify that relocation benefits apply for both temporary and permanent displacement.
§ 46.2-1.15 Definitions	§ 36.38.15 Definitions	- 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. Single-family 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 make it consistent with the CSFRA.
§ 46.2-1.20 and § 46.2-1.25	§ 36.38.20	- 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.

		• 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.
§ 46.2-1.25 Temporary Relocation	N/A	• Existing TRA0 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of Return	• § 36.38.30 currently addresses the right of tenants to return to existing rental units that were previously withdrawn from the rental market pursuant to Government Code § 7060 (Ellis Act).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 Displacement Related to Development and Building Permits	§ 36.38.25	• 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.
Division 3. Miscellaneous		
§ 46.2-3.5 Language Accessibility	§ 36.38.25.c	Translations for those with limited English Proficiency.
§ 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