

**DOCKETED**

<b>Docket Number:</b>	24-BPS-01
<b>Project Title:</b>	Building Energy Performance Strategy Report
<b>TN #:</b>	264360
<b>Document Title:</b>	Ritu Mahajan Comments - Commercial Tenant Displacement
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Ritu Mahajan
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/19/2025 10:54:48 AM
<b>Docketed Date:</b>	6/19/2025

*Comment Received From: Ritu Mahajan*  
*Submitted On: 6/19/2025*  
*Docket Number: 24-BPS-01*

## **Commercial Tenant Displacement**

Public Counsel is a legal nonprofit organization based in Los Angeles. Through our Community Development Project, we assist hundreds of low-income small business owners and nonprofits serving low-income communities in LA County each year. Many of our clients lease commercial space for their operations and are barely able to cover their expenses each month. While combating climate change and improving energy efficiency is very important, we are concerned that the quest to achieve these goals may result in the displacement of community-serving businesses and nonprofits. We recommend advancing commercial tenant protections to limit the displacement of businesses and nonprofits as a result of measures taken to improve building energy performance. Some examples of these types of protections include:

1. Adopting commercial tenant anti-harassment ordinances. See example from LA County here: <http://file.lacounty.gov/SDSInter/bos/supdocs/166203.pdf>
2. Vacancy tax imposed on property owners of vacant commercial properties. See example from San Francisco: <http://sftreasurer.org/business/taxes-fees/commercial-vacancy-tax-cvt>
3. Right to relocation assistance if commercial tenant is forced to move by landlord- relocation assistance amount increases for example based on size of commercial space and how many years business owner has been renting the space
4. Just cause eviction protections- would prohibit termination of tenancy without just cause. Just cause would include for example failure to pay rent, breach of the lease, and using the rental unit for an illegal purpose.
5. Other commercial tenant protection ideas- <https://antidisplacement.org/toolkit/>

Thanks,  
Ritu Mahajan