

Communication from Public

Name: Brittany D. Rivas

Date Submitted: 10/15/2024 06:53 PM

Council File No: 24-1225

Comments for Public Posting: My name is Brittany D. Rivas. I am a tenant of Southeast LA and work in Wilmington (District 15) with Communities for a Better Environment as the Climate Adaptation and Resilience Enhancement Coordinator. I am writing to urge you to amend the Just Cause for Eviction Ordinance to stop evictions for substantial remodels and vote yes on (Agenda item 8) an urgency ordinance to stop the surge of these evictions now. Los Angeles will soon mandate electrification and energy-efficiency upgrades to residential buildings, including rental units. These upgrades will cause evictions if you do not act now to close the substantial remodel loophole. Housing justice is climate justice. Therefore, we cannot address our climate crisis by worsening our housing crisis. Evictions displace families and communities and force long commutes, sprawl, and other climate impacts. Folx that end up unhoused and are currently unhoused will face the harshest of climate realities from extreme heat and flooding health impacts. All Angelenos deserve to live in healthy homes without fear of eviction and displacement. I urge you to join with the many other cities in Los Angeles County that have closed the “renovictions loophole” by amending the Just Cause Ordinance to stop evictions for substantial remodels and ensure there is an urgency ordinance to protect folx now. Sincerely, Brittany D. Rivas

Communication from Public

Name:

Date Submitted: 10/15/2024 02:35 PM

Council File No: 24-1225

Comments for Public Posting: My name is David. I am a tenant in Westlake, in Council District 1, and am a board member of the Beverly-Vermont Community Land Trust. In support of the 1512 Mohawk Tenants Association, I am here to urge you to amend the Just Cause for Eviction Ordinance to stop evictions for substantial remodels and vote yes on an urgency ordinance to stop the surge of these evictions now. Renovictions have impacted me and my neighbors negatively. Specifically for the 1512 Mohawk Tenants Association, the pressure to vacate their building has been relentless. Since the building was purchased by FJ Equities in late 2022, the tenants have been subjected to relentless efforts to push them out. When harassment hasn't worked, the landlord has turned to "substantial remodels." Management has repeatedly offered "cash for keys" buyouts, issued countless notices about changing tenancy terms, and imposed rent increases—all while threatening eviction and making vague claims about necessary renovations. Despite the eviction notices, no substantial work has been done on the units that have already been vacated, making it clear that the landlord's priority is not tenant safety or building improvements but rent hikes. In the early 2000s, Los Angeles saw a surge in evictions for renovation work and quickly amended its Rent Stabilization Ordinance to remove renovations as a basis for eviction. Now we are seeing another surge, this time in properties not covered by the RSO. I ask that you extend these same eviction protections to all renters in Los Angeles. No one should lose their home because their landlord decides to renovate or remodel, especially if the landlord intends to flip the unit and rent it out at a higher rate. This tactic both displaces community members and reduces the city's already insufficient affordable housing stock. Instead, landlords should have to comply with city programs to temporarily relocate tenants and guarantee their right to return. All Angelenos deserve to live in healthy homes without fear of eviction and displacement. I urge you to join with the many other cities in Los Angeles County that have closed the "renovictions loophole" by amending the Just Cause Ordinance to stop evictions for substantial remodels.

Communication from Public

Name: Zach Lou

Date Submitted: 10/15/2024 03:26 PM

Council File No: 24-1225

Comments for Public Posting: On behalf of the California Green New Deal Coalition, I am writing to urge you to amend the Just Cause for Eviction Ordinance to stop evictions for substantial remodels and vote yes on an urgency ordinance to stop the surge of these evictions now. As a statewide alliance of environmental justice, climate, community, and worker organizations, we know that we cannot address our climate crisis by worsening our housing crisis. Los Angeles will soon mandate electrification and energy-efficiency upgrades to residential buildings, including rental units, but these upgrades might cause evictions if you do not act now to close the substantial remodel loophole. These evictions would worsen the homelessness crisis and the climate crisis, displacing families and communities and forcing long commutes, sprawl, and other climate impacts. As we push for climate solutions, we must also work to ensure our communities are stable. Ending "renovictions" will prevent displacement and ensure tenants are not harmed by urgently needed home upgrades. No one should lose their home because their landlord decides to renovate or remodel, especially if the landlord intends to flip the unit and rent it out at a higher rate. We urge you to close the substantial remodel loophole. Thank you.

Communication from Public

Name: Morgan Goodwin
Date Submitted: 10/15/2024 03:30 PM
Council File No: 24-1225

Comments for Public Posting: As the Sierra Club, we strongly support the City Council's motion to stop renovictions and urge the immediate passage of an urgency ordinance to halt these unjust evictions. Renovictions—where landlords exploit a legal loophole allowing evictions for "substantial remodels"—are displacing long-standing tenants across Los Angeles. This practice not only disrupts the lives of individuals and families but also contributes to the erosion of affordable housing stock, exacerbating the city's housing crisis. As we pursue critical electrification and energy-efficiency upgrades in the fight against climate change, we must ensure that these efforts do not lead to tenant displacement. Housing stability is integral to equitable climate solutions, and addressing renovictions now will help secure both environmental and social justice. We cannot allow landlords to use renovations as a pretext to raise rents and push vulnerable residents out of their homes. Angelenos deserve stability, and no one should face eviction under the guise of a remodel, especially in a city with one of the most severe housing shortages in the nation. This tactic disproportionately affects low-income tenants and communities of color, amplifying inequalities that already plague our housing system. By passing this urgency ordinance, Los Angeles would join other cities like Inglewood, Culver City, and South Pasadena that have closed the renoviction loophole, preventing displacement and preserving affordable housing. The Council should also consider extending the Tenant Habitability Plan, ensuring that any necessary renovations are done without forcing tenants into homelessness. We urge the Council to act swiftly and decisively by passing an emergency moratorium on renovictions, protecting tenants, and ensuring that Los Angeles remains a livable city for all.

Communication from Public

Name: Dennis K
Date Submitted: 10/15/2024 11:03 AM
Council File No: 24-1225

Comments for Public Posting: My name is Dennis. I am a tenant, and I live in Westlake in CD1. I am here to urge you to amend the Just Cause for Eviction Ordinance to stop evictions for substantial remodels and vote yes on an urgency ordinance to stop the surge of these evictions now. In the early 2000s, Los Angeles saw a surge in evictions for renovation work and quickly amended its Rent Stabilization Ordinance to remove renovations as a basis for eviction. Now we are seeing another surge, this time in properties not covered by the RSO. I ask that you extend these same eviction protections to all renters in Los Angeles. No one should lose their home because their landlord decides to renovate or remodel, especially if the landlord intends to flip the unit and rent it out at a higher rate. This tactic both displaces community members and reduces the city's already insufficient affordable housing stock. Instead, landlords should have to comply with city programs to temporarily relocate tenants and guarantee their right to return. Renovictions would impact my community negatively. They have been used to evict members of my community and place an unfair burden on tenants and their communities—whether it be struggling to find affordable housing in this time, having to move schools, or displacing folks from where they grew up. All Angelenos deserve to live in healthy homes without fear of eviction and displacement. I urge you to join with the many other cities in Los Angeles County that have closed the “renovictions loophole” by amending the Just Cause Ordinance to stop evictions for substantial remodels.

Communication from Public

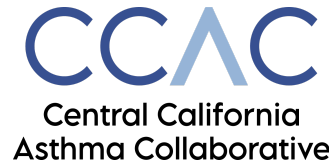
Name:

Date Submitted: 10/15/2024 12:53 PM

Council File No: 24-1225

Comments for Public Posting: Dear Honorable Members of the Housing and Homelessness Committee, Los Angeles is advancing efforts to adopt a Building Energy Performance Standard, which will require residential buildings to decarbonize by removing gas appliances, replacing them with electric alternatives, and implementing energy efficiency measures. While we fully support the city's ambitious climate-change mitigation goals, we are deeply concerned that these requirements will lead to evictions and displacement through the use of the substantial remodel clause in the Just Cause for Eviction Ordinance. The substantial remodel clause is a loophole that allows landlords to evict in order to undertake substantial renovations. Data from the Los Angeles Housing Department show more than 200 households have been evicted under the clause over the past 18 months. Los Angeles' decarbonization mandates threaten to accelerate this practice, as retrofits qualify as a just-case reason to evict under the ordinance. This will create a devastating wave of evictions in a city already in the grip of a crisis, with almost 35,000 eviction cases filed since January. The substantial remodel loophole must be closed to ensure climate protection does not come at the expense of housing security. Even the Los Angeles Department of Building and Safety, which is working on the City's forthcoming decarbonization policy, noted in their August 2024 report that, "While energy improvements and decarbonization can make housing safer, less polluted, and more comfortable by addressing indoor pollution, current regulations don't prevent landlords from passing the costs of decarbonization on to tenants and may even provide grounds for evicting tenants due to significant renovations. Tenants can be protected from such risks by: closing the Substantial Remodel Loophole...." Other California cities, including Culver City, Inglewood, and South Pasadena, have already removed the substantial remodel provision from their just-cause ordinances to protect non-RSO tenants from unnecessary evictions. Los Angeles must follow suit. The city already has an effective mechanism for regulating construction work in rentals, the Tenant Habitability Plan (THP), which currently applies to tenants in rent-stabilized units. The THP creates a process for landlords to temporarily relocate tenants impacted by construction work, and should apply to all Los

Angeles tenants. We cannot allow climate policy to be used as a tool for displacement. We urge the committee to close the substantial remodel loophole and adopt an urgency ordinance to go into effect immediately. Without your action, the Building Energy Performance Standard and other decarbonization efforts may inadvertently worsen our affordable housing crisis and push more families into homelessness. Decarbonization and housing justice must go hand-in-hand to achieve an equitable, sustainable future for all Angelenos. Thank you for your time and consideration of this urgent matter. Sincerely, Building Decarbonization Coalition Building Electrification Institute Building Energy, Equity and Power Coalition California Environmental Voters California Green New Deal Coalition Central California Asthma Collaborative Center on Race, Poverty, & the Environment Climate & Community Institute Climate Resolve Communities for a Better Environment Courage California EarthJustice Esperanza Community Housing Food and Water Watch Human Impact Partners Institute for Market Transformation Local Clean Energy Alliance Los Angeles Alliance for a New Economy Los Angeles for Resilient and Healthy Homes Coalition Natural Resources Defense Council Pacoima Beautiful Physicians for Social Responsibility - Los Angeles Rewiring America Rise Economy Sierra Club Strategic Actions for a Just Economy Strategic Concepts in Organizing and Policy Education The Greenlining Institute U.S. Green Building Council California



October 15, 2024

Los Angeles City Council
Housing and Homelessness Committee
200 N. Spring Street
Los Angeles, CA 90012

Subject: AGENDA ITEM 8 on Removing Substantial Remodel as a Basis for Eviction, Council File No. 24-1225

Dear Honorable Members of the Housing and Homelessness Committee,

Los Angeles is advancing efforts to adopt a Building Energy Performance Standard, which will require residential buildings to decarbonize by removing gas appliances, replacing them with electric alternatives, and implementing energy efficiency measures. While we fully support the city's ambitious climate-change mitigation goals, we are deeply concerned that these requirements will lead to evictions and displacement through the use of the substantial remodel clause in the Just Cause for Eviction Ordinance.

The substantial remodel clause is a loophole that allows landlords to evict in order to undertake substantial renovations. Data from the Los Angeles Housing Department show more than 200 households have been evicted under the clause over the past 18 months. Los Angeles' decarbonization mandates threaten to accelerate this practice, as retrofits qualify as a just-case reason to evict under the ordinance. This will create a devastating wave of evictions in a city already in the grip of a crisis, with almost 35,000 eviction cases filed since January. The substantial remodel loophole must be closed to ensure climate protection does not come at the expense of housing security. Even the Los Angeles Department of Building and Safety, which is working on the City's forthcoming decarbonization policy, noted in their [August 2024 report](#) that, "While energy improvements and decarbonization can make housing safer, less polluted, and more comfortable by addressing indoor pollution, current regulations don't prevent landlords from passing the costs of decarbonization on to tenants and may even provide grounds for evicting tenants due to significant renovations. Tenants can be protected from such risks by: closing the Substantial Remodel Loophole...."

Other California cities, including Culver City, Inglewood, and South Pasadena, have already removed the substantial remodel provision from their just-cause ordinances to protect non-RSO tenants from unnecessary evictions. Los Angeles must follow suit. The city already has an effective mechanism for regulating construction work in rentals, the Tenant Habitability Plan (THP), which currently applies to tenants in rent-stabilized units. The THP creates a process for landlords to temporarily relocate tenants impacted by construction work, and should apply to all Los Angeles tenants.

We cannot allow climate policy to be used as a tool for displacement. We urge the committee to close the substantial remodel loophole and adopt an urgency ordinance to go into effect

immediately. Without your action, the Building Energy Performance Standard and other decarbonization efforts may inadvertently worsen our affordable housing crisis and push more families into homelessness.

Decarbonization and housing justice must go hand-in-hand to achieve an equitable, sustainable future for all Angelenos. Thank you for your time and consideration of this urgent matter.

Sincerely,

Building Decarbonization Coalition
Building Electrification Institute
Building Energy, Equity and Power Coalition
California Environmental Voters
California Green New Deal Coalition
Central California Asthma Collaborative
Center on Race, Poverty, & the Environment
Climate & Community Institute
Climate Resolve
Communities for a Better Environment
Courage California
EarthJustice
Esperanza Community Housing
Food and Water Watch
Human Impact Partners
Institute for Market Transformation
Local Clean Energy Alliance
Los Angeles Alliance for a New Economy
Los Angeles for Resilient and Healthy Homes Coalition
Natural Resources Defense Council
Pacoima Beautiful
Physicians for Social Responsibility - Los Angeles
Rewiring America
Rise Economy
Sierra Club
Strategic Actions for a Just Economy
Strategic Concepts in Organizing and Policy Education
The Greenlining Institute
U.S. Green Building Council California

Communication from Public

Name:

Date Submitted: 10/15/2024 12:59 PM

Council File No: 24-1225

Comments for Public Posting: See the attached letter from a coalition of tenants and housing policy advocates, affordable housing providers, attorneys, and tenant organizers in support of an urgency ordinance to stop substantial remodel evictions immediately while Council develops a plan to permanently remove substantial remodel as a basis for eviction under the Just Cause for Eviction Ordinance.



LOS ANGELES FOR
RESILIENT &
HEALTHY HOMES

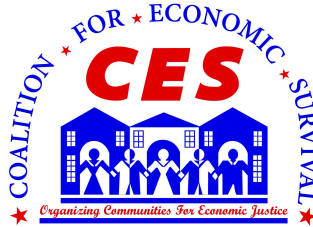


T.R.U.S.T.
SOUTH LA
TENEMOS QUE RECLAMAR Y UNIDOS SALVAR LA TIERRA

Public
Counsel
LAW CENTER



COMMUNITIES
FOR A BETTER
ENVIRONMENT
established 1978



October 15, 2024

Los Angeles City Council
Housing and Homelessness Committee
200 N. Spring Street
Los Angeles, CA 90012

Subject: AGENDA ITEM 8 on Removing Substantial Remodel as a Basis for Eviction, Council File No. 24-1225

Dear Members of the Housing and Homelessness Committee,

We are a coalition of tenants and housing policy advocates, affordable housing providers, attorneys, and tenant organizers urging you to vote in favor of an urgency ordinance to stop substantial remodel evictions immediately while you develop a plan to permanently remove substantial remodel as a basis for eviction under the Just Cause for Eviction Ordinance.

The substantial remodel loophole, as outlined in Los Angeles Mun. Code, § 165.03 subd. (I)(2), also known as “renoviction,” allows landlords to evict tenants by making renovations to a building or unit that will require tenants to vacate for more than 30 days. Once the tenants have moved out, landlords then re-rent the units to new tenants without being limited by existing rent caps.¹

According to data obtained by the Los Angeles Housing Department, corporate landlords have been using this loophole by purchasing properties to evict long-standing tenants and reset rents to market rate in units otherwise protected by the Just Cause for Eviction Ordinance. In videos posted to YouTube, landlord attorney Dennis Block describes the substantial remodel loophole as a way to “beat rent control” and advises landlords to use it to remove tenants paying below market-rate rents who they otherwise would have no basis to evict.²

Although this cause for eviction has not been in effect for very long in Los Angeles, already it is contributing to displacement, and historic data tells us the problem will continue to get worse. The number of renovictions has risen sharply since the expiration of COVID eviction protections, and swift action is necessary to protect vulnerable renters, safeguard communities, and ensure our affordable housing crisis does not get worse. Our analysis of the City’s data on substantial remodel notices, cross-referenced with real estate records, show that since March 2024, most substantial remodel notices were served shortly after transfer of property ownership, or right afterward, suggesting that eviction is part of an investment strategy.

We know from our own work that the number of notices on file also understates the number of tenants impacted. For example, we are aware of a 21-unit building that has now been mostly emptied of tenants: the landlord purchased the building, served notices on some tenants and bought out or intimidated out the rest. Only seven notices are recorded for that address in the city’s data, although there are a number of harassment complaints on file with the City for this address. This illustrates how the existence of this law allows landlords to harass and pressure tenants to move out without ever having the notices recorded by the city.

The trend mirrors the rise in evictions during the early 2000s for “major rehabilitation,” a provision the city eliminated for rent-stabilized (RSO) units in 2005 after recognizing it was contributing to a loss of affordable housing.³ At that time, the city also created the Tenant Habitability Program (THP) to temporarily relocate tenants during construction while not allowing

¹ See Paloma Esquivel, She fought remodel evictions for years. Now she’s the one being evicted, Los Angeles Times (Jun. 25, 2024), <https://www.latimes.com/california/story/2024-06-25/she-fought-substantial-remodel-evictions-for-years-now-shes-being-evicted>; Amber X. Chen, ‘Substantial remodel’ — a legal loophole to evict tenants in LA, Los Angeles Public Press (Oct. 25, 2023), <https://lapublicpress.org/2023/10/substantial-remodel-a-legal-loophole-to-evict-tenants-in-la>.

² <https://www.youtube.com/watch?v=xN82HizJWS0>

³ See Los Angeles Mun. Ord. No. 176,544 (May 2, 2005). In establishing a moratorium on substantial remodel, the City noted that “the recent upsurge in evictions for major rehabilitation represents a demonstrated loss of affordable housing, particularly in neighborhoods undergoing ‘gentrification,’ and the ensuing destruction of existing residential communities.” Los Angeles Mun. Ord. No. 174721 (Jul. 16, 2022).

them to be evicted.⁴ This common-sense solution for renovating without displacement should be extended to all tenants in Los Angeles, not just those covered by the RSO.

We also strongly urge the committee to adopt an urgency ordinance, effective immediately, to halt all current renovations in Los Angeles. Over the past 18 months, more than 200 households across all 15 council districts have been impacted by substantial remodel evictions. In one Echo Park building organized by the Los Angeles Tenants Union, 21 tenants from five households—including five children still in school and eight seniors—have been fighting eviction attempts since corporate landlord FJ Equities purchased their building in late 2022. FJ Equities has repeatedly tried to claim bathroom and kitchen remodels necessitate evictions. Not only is this work unnecessary, but it is being carried out to market the units to higher-paying tenants. After one household moved out, their \$1,100/month unit was listed online for \$3,500. This household now rents in Corona and commutes to Pacific Palisades for work because they can no longer afford to live here.

All over Los Angeles, corporate landlords are purchasing non-RSO buildings, immediately serving eviction notices for substantial remodel work, and then raising the rents. Most tenants do not have the resources to fight these evictions in court, and so they self-evict. Those who do are often subject to repeated eviction filings when first or second attempts don't work; the Echo Park tenants mentioned above are currently facing their third eviction attempt since the spring 2023. For these tenants and many others, an urgency ordinance would guarantee housing security while a permanent solution is developed by Council. It would also prevent unscrupulous landlords from using the window of time before the substantial remodel loophole is permanently closed to rush evictions through, as they did when the state law AB 1482 was passed.

California law allows an ordinance to apply to pending cases until final judgment.⁵ So that there is no confusion in unlawful detainer actions, we ask you to instruct the city attorney to immediately draft an urgency ordinance to suspend Los Angeles Municipal Code Section 165.03.1(2) as a cause for eviction under the Just Cause for Eviction Ordinance, including for all unlawful detainer proceedings not yet reduced to a final judgment. This is important because even if the City Council asks the City Attorney to draft an urgency ordinance, a landlord could still serve an eviction notice now or file an eviction lawsuit now to try to evict a tenant for substantial remodel. Our members and clients are people with pending notices and pending cases who need this assistance now.

Recognizing the long-term harm that evictions cause, including removing affordable units from the housing market, displacing families and communities, and increasing rates of homelessness, many Southern California cities have removed substantial renovation as a legal basis for eviction if they ever allowed it at all.⁶ Some jurisdictions, like Maywood, Claremont, and

⁴ Los Angeles Mun. Code, § 152.06 subd. B.

⁵ See, e.g., *Brenton v. Metabolife Internat., Inc.* (2004) 116 Cal.App.4th 679, 690.

⁶ See Baldwin Park Mun. Code, § 129.8 subd. (a), Culver City Mun. Code, § 15.09.320; Inglewood Mun. Code, § 8-121 subd. (a); Los Angeles County Code, § 8.52.090 subd. (E); Maywood Mun. Code, § 8.17.030; South Pasadena Mun. Ordinance No. 2384 (Nov. 15, 2023).

South Pasadena, also passed moratoriums to temporarily ban substantial remodel evictions as permanent ordinances were developed. It's time for Los Angeles to do the same.

Thank you for your attention to this urgent matter.

Sincerely,

Alliance of Californians for Community Engagement
Coalition for Economic Survival
Communities for a Better Environment
Community Power Collective
Esperanza Community Housing
Inner City Law Center
InnerCity Struggle
Inquilinos Unidos
Los Angeles for Resilient and Healthy Homes Coalition
Los Angeles Tenants Union - Echo Park Chapter
Movement Legal
Public Counsel
Strategic Actions for a Just Economy
T.R.U.S.T. South LA
Western Center on Law and Poverty
152 Mohawk Street Tenants Association

Exhibit A:
Data from the Los Angeles Housing Department
on Substantial Remodel Eviction Notices

Date of Most Recent Transfer of Property Ownership	Date Eviction Notice(s) Received by LAHD	Time from Transfer of Ownership to Eviction Notice	APN
9/14/23, 9/20/24	3/1/2024	5.5 months prior and 6.5 months after	2513023009
1/31/2024	3/7/2024	1.5 months prior	4252030044
8/10/2023	3/21/2024	6.5 months prior	6109002041
4/15/2024	3/29/2024	<1 month after eviction notice	6055019028
9/23/2022	4/3/2024	>18 months prior	6084019034
3/22/2024	4/8/2024	< 1 month prior	4265006001
7/22/2016	4/10/2024	>18 months prior	2276002037
9/30/2024	4/30/2024	7 months prior	2717018008
4/1/2024	5/3/2024	1 month prior	6035024017
8/10/2023	5/6/2024	9 months prior	5063002012
11/20/1996	5/20/2024	>18 months prior	4115010014
1/31/2024	5/23/2024	4 months prior	4252030044
1/6/2023	5/23/2024	16.5 months prior	2173002033
6/26/2024	6/4/2024	<1 month after eviction notice	5172022010
12/8/2023	6/6/2024	6 months prior	5202013005
12/8/2023	6/6/2024	6 months prior	5202013005
10/18/2023	6/7/2024	8 months prior	4004034021
4/9/2024	6/7/2024	2 months prior	6016015027
2/14/2018	6/10/2024	>18 months prior	5155033016
8/6/2007	7/3/2024	>18 months prior	2689026012
1/31/2024	7/12/2024	5.5 months prior	4252030044
11/4/2020	7/16/2024	>18 months prior	5457028019
8/22/2023	7/29/2024	11 months prior	5540008014
7/12/2024	8/6/2024	<1 month prior	6031031022
9/5/2024	8/14/2024	<1 month after eviction notice	5469028013
5/31/2024	8/15/2024	2.5 months prior	5155002003
1/10/2024	8/15/2024	7 months prior	4429028044
8/25/2020	8/30/2024	>18 months prior	4212002015
7/27/2021	9/10/2024	>18 months prior	6014023021
7/11/2024	9/10/2024	14 months prior	2666007007
10/18/2023	9/12/2024	11 months prior	4004034021
12/15/2004	9/17/2024	>18 months prior	2727012046

Communication from Public

Name: Fred Sutton
Date Submitted: 10/15/2024 12:59 PM
Council File No: 24-1225
Comments for Public Posting: Attached, please find a letter from the California Apartment Association Regarding this matter.



California Apartment Association
Los Angeles County

October 15, 2024

Chair Nithya Raman
Housing & Homelessness Committee
City of Los Angeles
VIA Email

Re: Item 8- Substantial Remodel Changes ([C.F. 24-1225](#))

Dear Chair Raman,

On behalf of the California Apartment Association (CAA), which represents a broad spectrum of housing providers and industry-supporting businesses, we are committed to promoting fair and equitable housing policies within the City of Los Angeles. We respectfully request that the council include additional items in the department's forthcoming report.

The Tenant Protection Act established a streamlined process for renovating and remodeling aging buildings, which guarantees monetary assistance to tenants if specific rehabilitation conditions are met. "Substantial Remodels" go well beyond cosmetic changes; they address critical repairs that improve safety, habitability, and the long-term viability of rental housing.

62% of the city's housing stock was built before 1970, and over 75% before 1980. As a result, Los Angeles' housing infrastructure is aging, yet there is no efficient process for upgrading these properties. The city's existing solution, the Primary Renovation Program, is underutilized by housing providers due to its complexity and prohibitive costs. Furthermore, we have received reports indicating that applications for "Just and Reasonable" rent increases under the Rent Stabilization Ordinance (RSO) are experiencing significant delays.

The complexity of the Primary Renovation Program, combined with the delay in processing rent increase requests, may be discouraging necessary improvements. Therefore, the city should assess whether the current program is functioning as intended and why it may be underused.

As part of the department's report and recommendations, we respectfully request the inclusion of the following data points:

- 1. The number of applications filed for Substantial Remodel for applicable properties.**
- 2. The number of applications filed under the Primary Renovation Program.**
- 3. The number of completed Primary Renovation Program projects.**
- 4. The number of "Just and Reasonable" rent increases granted under the RSO by year.**
- 5. The number of pending "Just and Reasonable" rent increase applications, along with the average processing time.**

Eliminating the Substantial Remodel provisions, a key aspect of the Tenant Protection Act, without fully understanding the efficacy of the existing processes for RSO properties would be premature. It is critical that the city avoids adopting programs or processes that do not work as intended, especially when some older buildings are in urgent need of rehabilitation.



California Apartment Association
Los Angeles County

We urge the committee to incorporate an exploration of these items into any recommendations or proposals put forth by the Housing Department.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Fred Sutton". The signature is written in a cursive style with a long horizontal stroke at the end.

Fred Sutton
California Apartment Association

Communication from Public

Name: Christine Rodriguez

Date Submitted: 10/15/2024 10:10 AM

Council File No: 24-1225

Comments for Public Posting: Working for Los Angeles Center for Community Law and Action, I have seen numerous Los Angelinos being served with evictions notices with the basis of "Substantial remodel". The families being evicted from their homes, pay low and affordable rent. Landlords are realizing that they can use the excuse of a "substantial remodel" as a way to evict people out of their homes and increase the rent in order to gain larger profits for themselves. This loophole has caused unnecessary displacement of children, the elderly, the sick, the poor and those who struggle to survive day by day, week by week and month by month. The "substantial remodel" provision does not serve the community and only works as a tool for landlords to use to justify kicking people out of their homes. If the city is concerned with the current and growing homeless crisis, it would amend this provision immediately. I work as a paralegal for eviction cases here in Los Angeles, and I have worked with families who were promised relocation assistance but denied re-entry into their home once "substantial remodeling" was complete. The relocation assistance offered by landlords is often one months worth of rent, or does not reflect the appropriate amount to support temporary housing while repairs take place. Others have been told they can re-enter their homes, so long as they can afford the increased rent from paying \$900 a month to now having to pay up to \$2,000 for rent. Many have been lied to about returning their homes, only to have landlords cease contact once families have moved out. I urge the committee to put working class community members first, and to amend the close the loophole of the substantial model provision, so that the tenants of Los Angeles can continue to be housed and live with dignity.