

## Communication from Public

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**Comments for Public Posting:** Honorable Chair Blumenfield and members of the PLUM Committee, I am writing in support of the Carlton Serrano Tenants Association Appeal. As a constituent, I oppose this development, which seeks the demolition of seven rent-controlled (RSO) apartment buildings and the eviction and displacement of nearly fifty vulnerable tenants. This project is noncompliant with State Bill CA SB8, noncompliant with California's "No Net Loss" law, noncompliant with the Los Angeles Resident Protection Ordinance RPO, noncompliant with the Station Neighborhood Area Plan (SNAP) Subarea A, and last but not least, noncompliant with CEQA. We must preserve our existing affordable housing stock. Unless decision-makers understand that we need to do both, preserve and produce, we will be doomed to a failed housing policy, and our crisis will get worse. The project's proposed 15 "Very Low Income" units, while seemingly beneficial, do not adequately compensate for the demolition of 25 existing naturally-occurring low-income RSO units. Currently there are only 15 units (10.8% of the apartments proposed) reserved as affordable. If new RSO units are set at market-rate prices, this does not create more affordable housing. In fact, it has the opposite effect, essentially gentrifying the original residents of the neighborhood. This project results in a net loss of 10 affordable RSO units. The developer's extensive reliance on off-menu waivers - including a 176% height increase and 74% reduction in open space - reflects an apparent attempt to maximize private profit by circumventing zoning and design standards intended to protect neighborhood livability. This approach undermines the fundamental purpose of density bonus laws, which are intended to encourage affordable housing, not to facilitate luxury development at the expense of established community standards and quality of life. Specific Plan Project Compliance (SPPC) Findings for this project are erroneous. Because a waiver has been granted does not mean that the proposed development is compliant. SNAP was created to prevent developments like this from intruding on our community and low-scale residential neighborhoods. To say that this project is compliant is against the very principle of SNAP itself, particularly in the most restrictive area, Subarea A. SNAP was created to preserve our existing communities. The removal of 17 trees, including two native,

protected California Oaks, violates LA's Protected Tree Ordinance and invalidates the CEQA Class 32 exemption. In a neighborhood facing severe heat exposure and high asthma rates, these trees provide vital ecosystem services: cooling, stormwater absorption, air filtration, and public health protection. Their destruction would constitute a significant environmental impact under CEQA and must trigger a full Environmental Impact Report (EIR). CEQA's mandate to consider historic resources, even if they only have "contextual" or "associative" value must be addressed. These buildings, some built between 1916–1948, have unique character and charm that is irreplaceable and unmistakably classic Hollywood. They are part of a charming historic cluster adjacent to the Edith Northman-designed Hollywood Carlton Apartments. Edith Northman is the first female registered architect in Los Angeles; demolishing these units would degrade the historic fabric of this block and potentially violate CEQA's protections for contextual historic resources. These historic apartments should be preserved. Additionally, the developers are bad actors. ROM Investments has a documented history of tenant harassment, code violations, unresponsiveness, and aggressive rent hikes. There are also documented fines against Leeor Maciborski for illegal campaign contributions and his consultant, Gary Benjamin, for failing to report lobbying. This dubious history is a significant finding and raises serious questions about their operational integrity and commitment to fair practices. Please support the appeal of the Carlton Serrano Tenants Association and do not allow this development to move forward. I am counting on you to side with the people, not the unethical consultants of bad actor developers. Sincerely, Justin Maurer, 90027

# **Preserving Community, Preventing Displacement: A Comprehensive Analysis of the Proposed Redevelopment at 5416-5430 W. Carlton Way**

## **I. Executive Summary**

This report presents a thorough analysis of the proposed demolition and redevelopment at 5416-5430 W. Carlton Way, Los Angeles, CA 90027, by developers Alchemy Planning and property owners ROM Investments. The core objective is to provide a robust, evidence-based argument for preserving the existing site and protecting its current tenants. The analysis reveals that while the project proposes new units, including a limited number of "affordable" units, its overall impact is poised to accelerate gentrification, displace long-term residents, and disrupt the socio-economic and cultural fabric of the Hollywood neighborhood.

The existing buildings at 5416-5430 W. Carlton Way, constructed between 1916 and 1948, are highly likely to be subject to Los Angeles's Rent Stabilization Ordinance (RSO), providing crucial affordability and eviction protections to their current residents. The proposed demolition of 25 existing homes, replaced by only 15 "very low-income" units out of 131 new apartments, represents a significant net loss of accessible affordable housing. This approach, often seen when developers leverage density bonus incentives primarily for market-rate expansion, fails to address the genuine housing needs of the displaced population, who may not qualify for or access the new, more restrictive affordable units.

Furthermore, the site holds contextual historical significance, being adjacent to the designated Hollywood Carlton Apartments (5400 W Carlton Way), a historic resource designed by Edith Northman, the first female registered architect in Los Angeles. Demolishing these older structures erodes the neighborhood's unique character and cultural heritage. A review of ROM Investments' history reveals a concerning pattern of fraudulent inducement and negligent misrepresentation lawsuits in other states, raising serious questions about their operational integrity and commitment to fair practices.

The demographic profile of ZIP Code 90027 indicates a community experiencing significant population turnover and vulnerability to rising housing costs, particularly impacting its Hispanic residents. Case studies from Hollywood and South Central Los Angeles demonstrate how similar development patterns, even those with affordable housing components, have historically led to substantial displacement, increased rents, and the erosion of community identity.

In conclusion, the proposed redevelopment at 5416-5430 W. Carlton Way threatens to

exacerbate Los Angeles's housing crisis by displacing vulnerable tenants, eroding historical character, and intensifying gentrification. This report advocates for the preservation of the existing site, the implementation of genuinely equitable housing solutions, and increased accountability for developers to ensure that urban development prioritizes community stability and housing justice.

## **II. Introduction: The Imperative of Housing Justice in Los Angeles**

Los Angeles is currently navigating a profound housing crisis, characterized by an acute shortage of affordable housing, steadily escalating rents, and a growing population experiencing homelessness. This crisis disproportionately burdens low-income communities and communities of color, forcing many long-term residents out of their neighborhoods due as housing costs become untenable. The ripple effects extend beyond individual households, impacting the social cohesion, cultural diversity, and economic stability of entire communities.

This report is commissioned to provide a rigorous, evidence-based analysis of a specific proposed development at 5416-5430 W. Carlton Way, Los Angeles, CA 90027. The primary purpose is to generate comprehensive research and strategic arguments to bolster the position of current tenants and housing justice advocates against the plans of developers Alchemy Planning and property owners ROM Investments. The proposed project involves the demolition of existing residential units to construct a larger apartment complex, which, despite claims of including "affordable units," is widely perceived as a catalyst for increased rents, intensified gentrification, displacement of current residents, and disruption to local traffic and community resources.

The scope of this analysis encompasses a multi-faceted examination of the property at 5416-5430 W. Carlton Way, situated within the Hollywood neighborhood (ZIP Code 90027). It delves into the site's historical and cultural context, scrutinizes the track record of the involved development entities, assesses the broader dynamics of the local housing market, and projects the socio-economic and cultural ramifications for the surrounding area. By synthesizing data from official city and state records, news outlets, Census data, and scholarly sources, this report aims to equip housing justice advocates with the necessary information to challenge the proposed development and champion equitable urban growth that prioritizes community well-being over speculative profit.

## **III. Key Housing, Development, and Tenant Protection Terminology**

Understanding the specialized terminology, acronyms, codes, ordinances, and processes within Los Angeles's housing and development landscape is fundamental for effective advocacy. This section provides a glossary of critical terms, offering context for their significance in the ongoing debate over urban development and tenant rights. The reason for defining these terms is

primarily to demystify city, developer, and political jargon into straightforward terms meant to be understood by the general and below-average public.

## **A. Los Angeles Housing + Community Investment Department (HCIDLA) & Related Programs**

The **Los Angeles Housing + Community Investment Department (HCIDLA)** is a pivotal entity in the city's efforts to address housing needs. Formed in 2013 from the merger of the LA Housing Department and the Community Development Department, HCIDLA oversees a wide array of social services and housing programs. These initiatives are designed to assist low-income, homeless, and special needs populations, alongside managing the development of supportive and affordable housing across the City of Los Angeles.[1, 2] A significant example of HCIDLA's commitment is its oversight of the \$1.2 billion bond-funded Proposition HHH, which aims to add over 7,400 low-income deed-restricted housing units between 2018 and 2022.[2] This substantial investment underscores a clear city-wide objective to genuinely increase the supply of affordable housing. When a proposed development, such as the one at W. Carlton Way, claims to offer "affordable units" but concurrently involves the demolition of existing, accessible housing, it becomes imperative to evaluate whether such a project truly aligns with HCIDLA's broader mission of expanding *truly affordable* housing stock or if it merely contributes to a net loss of affordability under a different classification. The city's investment in programs like Proposition HHH provides a policy benchmark against which the true impact of private developments on housing affordability can be measured.

The **Rent Stabilization Ordinance (RSO)** is a cornerstone of tenant protection in Los Angeles. This ordinance regulates rent-controlled properties, dictating permissible rent increases and establishing "just cause" grounds for eviction.[1, 3] Properties typically fall under RSO if their certificate of occupancy was issued on or before October 1, 1978, with certain replacement units built after 2006 also being rent-controlled.[1] The existing buildings at 5416-5430 W. Carlton Way were constructed between 1916 and 1948 [4, 5], making them highly probable candidates for RSO protection. The planned demolition of these units directly impacts RSO-protected tenants, triggering specific legal requirements under both state and local laws concerning "just cause" evictions and relocation assistance.[6, 7, 8] Furthermore, California's "no-net loss" law for RSO units mandates that demolished RSO units must be replaced on a one-to-one basis with covenanted affordable units.[9] While this provision aims to preserve affordability, the crucial distinction lies in the nature of "covenanted affordable units" versus existing RSO units. The former often comes with stricter income eligibility requirements and lengthy waitlists, potentially rendering them inaccessible to the very tenants displaced from the existing RSO housing. This transformation can effectively push out long-term, low-income residents who rely on the more flexible and less bureaucratic protections of RSO. Other relevant programs and terms under HCIDLA include:

- **REAP (Rent Escrow Account Program):** Addresses properties violating safety and health standards, allowing tenants to pay reduced rent into an escrow account.[1, 3]
- **LIPA (Low Income Purchase Assistance):** Assists first-time, low-income homebuyers with down payments and closing costs.[1]

- **SCEP (Systematic Code Enforcement Program):** Involves routine inspections of rental properties to ensure safety and maintenance standards.[1]
- **TRIP (Tenant Relocation Inspection Program):** Provides relocation benefits for tenants forced to vacate due to hazardous conditions.[1]
- **CCRIS (Code, Compliance and Rent Information System) & HIMS (Housing Information Management System):** Online portals used for managing housing projects, loans, and community outreach related to housing conditions.[1]
- **URA (Uniform Relocation Assistance):** A federal regulation requiring compliance from developers and consultants involved in HUD-funded programs related to relocation.[1]

## **B. Los Angeles Department of Building and Safety (LADBS) & Planning Terms**

The **Los Angeles Department of Building and Safety (LADBS)** plays a central role in regulating construction and ensuring compliance with building codes. Key terms associated with LADBS and city planning include:

- **APN (Assessor Parcel Number):** A unique identifier assigned to each piece of property for tax and record-keeping purposes.[1, 3] The APN for 5416 Carlton Way is 5544022010.[4]
- **C of O (Certificate of Occupancy):** A document issued by LADBS confirming that a building meets all necessary codes and is safe for occupancy.[3]
- **CUP (Conditional Use Permit):** Allows for specific land uses that might not be permitted by default in a particular zone but are deemed appropriate under certain conditions and require a discretionary approval process.[3]
- **NOID (Notice of Intent to Demolish):** A formal notice that must be filed by a property owner or developer indicating their plan to demolish a structure.[3]

**ZIMAS (Zone Information and Map Access System)** is an indispensable web-based mapping tool provided by the City of Los Angeles. It offers comprehensive zoning and property information for parcels within the city.[3, 10, 11, 12] ZIMAS is the primary public portal for understanding a property's land use designations, zoning (e.g., LAR4 for 5416 Carlton Way [4]), and any associated overlays or specific plans. This tool is critical for verifying the legality of proposed developments and identifying any discrepancies with current regulations or community plans. Its accessibility empowers housing justice advocates to scrutinize the project's adherence to zoning requirements, determine if discretionary approvals (like density bonuses) are genuinely warranted, and assess if the proposed scale of development is appropriate for the area. This transparency provides a foundational basis for challenging non-compliance or plans that seem to overdevelop a site beyond its established character. The **California Environmental Quality Act (CEQA)** is a statewide law that mandates environmental impact assessment for discretionary projects.[3, 13, 14] While CEQA primarily focuses on physical environmental impacts, it can be a powerful legal instrument to challenge projects based on their broader social and economic consequences. Arguments can be made that significant displacement of residents, increased traffic congestion, strain on public services

due to population shifts, and the loss of established community character constitute indirect environmental impacts that warrant rigorous review. Demanding a full Environmental Impact Report (EIR) rather than a less stringent Mitigated Negative Declaration (MND) can compel developers to conduct a more thorough analysis of these complex social and economic effects, providing a formal avenue to document and challenge the project's contribution to gentrification and displacement.[15, 16]

Further terms related to city law and building standards include:

- **LAMC (Los Angeles Municipal Code):** The comprehensive body of city laws governing various aspects, including land use and housing.[1, 3]
- **LABC (Los Angeles Building Code) / LARC (Los Angeles Residential Code):** Specific codes that set the standards for design, construction, and safety of buildings within Los Angeles.[3]

## C. California Statewide Tenant Protections

The **California Tenant Protection Act (AB 1482)**, further strengthened by **Senate Bill 567 (SB 567)** effective April 1, 2024, provides crucial statewide safeguards for tenants. This legislation limits annual rent increases to no more than 5% plus the percentage change in the cost of living (Consumer Price Index), or a total of 10%, whichever is lower.[6, 7, 17] More critically for the W. Carlton Way case, the Act mandates "just cause" for evictions in residential rental properties, meaning landlords must have specific, legally defined reasons to terminate a tenancy.[6, 7]

SB 567 significantly enhances protections for "no-fault" evictions, which include scenarios such as demolition or substantial remodel of a property, or an owner's intent to move into a unit.[7] Under these provisions, landlords are required to provide relocation assistance (at least one month's rent, with potential for additional local requirements).[7] Furthermore, the law stipulates a "right of return" for displaced tenants: if the demolition or substantial remodel does not commence or is not completed, or if the owner or family member fails to move into the unit as stated, the unit must be offered back to the tenant at the same rent and lease terms as when they left, along with reimbursement for reasonable moving expenses.[7] These strengthened provisions offer clear legal grounds for tenants at 5416-5430 W. Carlton Way to demand comprehensive relocation benefits and to potentially challenge the legitimacy of the demolition process if the developer fails to adhere to the strict conditions for re-occupancy or if the project does not proceed as initially represented.

## D. City Planning and Development Processes

The City of Los Angeles guides its growth and development through a hierarchical planning framework, beginning with the **General Plan** and implemented through **Community Plans**. The General Plan establishes overarching policies for land use, resource allocation, and the city's long-term evolution, reflecting community values and city-wide priorities.[10] The city's 35 Community Plans, including the Hollywood Community Plan, form the Land Use Element of the General Plan, providing more specific land use designations and zoning guidance for individual neighborhoods.[10, 13, 14] The proposed development at 5416-5430 W. Carlton Way, with its

plan for an eight-story building in a neighborhood predominantly characterized by two- and three-story structures [5, 18], can be argued as inconsistent with the established character and social fabric envisioned by the Hollywood Community Plan. Even if the project technically complies with zoning through incentives, its scale may undermine the community's established identity, providing a strong policy-level argument for local opposition.

To encourage the development of affordable housing, Los Angeles utilizes various incentive programs such as the **Density Bonus**, **Transit Oriented Communities (TOC)**, **Measure JJJ**, and **Qualified Permanent Supportive Housing (QPSH)**. [13] These programs offer developers concessions, such as increased density or reduced parking requirements, in exchange for including a percentage of affordable housing units in their projects. [13] The proposed project at 5416-5430 W. Carlton Way explicitly utilizes density bonus incentives. [5] However, developers often leverage these programs primarily to maximize overall density and profitability, with the "affordable" component serving as a minimum requirement rather than a comprehensive solution to the housing crisis. The plan to replace 25 existing homes with 131 new units, only 14 of which are designated "very low-income" [5], illustrates this dynamic. This small number of new affordable units, typically subject to stringent income guidelines and lengthy waitlists, may not serve the same low-income population currently residing in the likely RSO-protected units being demolished. This outcome leads to a de facto displacement, contributing to overall gentrification by significantly increasing the market-rate housing supply in the area. The strategic use of these incentives can result in a development that, on paper, contributes to affordable housing goals, but in practice, exacerbates the affordability crisis for existing residents.

**Historic Preservation Overlay Zones (HPOZs)** are a crucial tool for protecting the distinctive architectural and cultural resources of Los Angeles's historic neighborhoods. [14, 19, 20] Designating an area as an HPOZ means that any new projects or exterior changes must complement the existing historic character and are subject to additional review by an HPOZ Board with specific design guidelines. [19, 20] While 5416-5430 W. Carlton Way may not currently be within an HPOZ, its proximity to the designated Hollywood Carlton Apartments at 5400 W Carlton Way, a historic resource built in 1941 and designed by Edith Northman (the first female registered architect in Los Angeles) [21, 22], provides strong grounds to argue for its contextual historic significance. The subject properties, built between 1916 and 1948 [4, 5], likely share architectural characteristics and contribute to the broader historical fabric of the area. Pursuing HPOZ designation for the block or advocating for similar historic review can protect the neighborhood's unique character. Studies indicate that HPOZ designation can lead to increased property values and an enhanced sense of community pride, as residents work together to preserve their shared history and architectural heritage. [19]

## **IV. Site-Specific Analysis: 5416-5430 W. Carlton Way**

This section provides a detailed examination of the property at 5416-5430 W. Carlton Way, the proposed redevelopment, the backgrounds of the involved parties, and the specific legal and regulatory implications of the project.

## **A. Property Overview and Proposed Project**

The property located at 5416-5430 W. Carlton Way, Los Angeles, CA 90027, is situated in a vibrant area just southeast of Metro's Hollywood/Western Station.[5, 18] The neighborhood is recognized for its prime location within Thai Town and Los Feliz, offering convenient access to diverse amenities, local eateries, and recreational spaces like Griffith Park.[23]

The site currently comprises small residential buildings constructed between 1916 and 1948.[5] Specifically, 5416 Carlton Way is an existing two-story, eight-unit multi-family building built in 1948.[4] The proposed project involves the demolition of 25 existing homes on the site.[5] The development plan calls for the construction of a new eight-story building spanning nearly 139,000 square feet, which will house 131 studio, one-, and two-bedroom apartments.[5, 18] Additionally, the existing two-story building with eight homes is planned to be retained, resulting in a total of 139 apartments on the property.[18] The development also includes subterranean parking for 148 vehicles.[5, 18]

Regarding affordability, the project states that 14 of the new apartments will be set aside as "very low-income affordable housing".[5] This affordable housing component is facilitated through the utilization of density bonus incentives, which allow developers to build more units than typically permitted by zoning in exchange for providing a certain percentage of affordable units.[5] The applicant for this project is identified as the Leeor Maciborski Trust, with ROM Investments listed as the property owner.[5, 18] Steinberg Hart is the architectural firm responsible for the design.[18] Gary Benjamin's firm, Alchemy Planning + Land Use, serves as a land-use consultant for ROM Investments on this project.[24] Construction is tentatively slated to commence in late 2025, with an anticipated completion in 2027.[18] Public statements from the developer indicate that tenants displaced by the project will have a right of return and will be offered financial assistance.[9, 18]

Despite the inclusion of "affordable" units, the proposed project represents a significant net loss of accessible affordable housing. The demolition of 25 existing homes, which given their construction dates (1916-1948) are highly likely to be Rent Stabilization Ordinance (RSO)-protected units [1, 4, 5], is offset by only 14 new "very low-income" units.[5] This discrepancy is critical because RSO units typically serve a broad spectrum of low- and moderate-income tenants without the stringent eligibility requirements and often lengthy waitlists associated with deed-restricted "very low-income" housing.[9] The small number of newly designated affordable units will likely not serve the same population as the displaced RSO tenants, effectively pushing them out of the neighborhood and contributing to the broader trend of gentrification. The stated tenant protections, such as a "right of return" and financial assistance, while legally mandated under the California Tenant Protection Act (AB 1482/SB 567) [7, 9], must be rigorously enforced to ensure they are genuinely sufficient to prevent displacement and not merely a procedural formality.

## **B. Historical and Cultural Significance**

The area surrounding 5416-5430 W. Carlton Way holds significant historical and architectural value. Immediately adjacent, at 5400 W Carlton Way, stands the Hollywood Carlton Apartments, which is officially recognized as a historic resource.[21, 22] This building, constructed in 1941, is celebrated as an excellent example of a 1940s apartment house in Hollywood, exhibiting distinctive features of its property type.[21, 22] Its historical significance is further elevated by its design, which is attributed to master architect Edith Northman, notably the first female registered architect in Los Angeles.[21, 22] The property at 5400 W. Carlton Way is described as a multi-family apartment house in the American Colonial Revival and Minimal Traditional styles, designed to maximize lot coverage, a common characteristic of multi-family properties in Los Angeles during the early 20th century.[21, 22]

The existing structures at 5416-5430 W. Carlton Way, built between 1916 and 1948 [4, 5], fall within a similar architectural and developmental period as the adjacent historic Hollywood Carlton Apartments. This temporal and physical proximity strongly suggests that the buildings at 5416-5430 W. Carlton Way contribute to the overall historical context and architectural continuity of the block and the wider Hollywood neighborhood. The demolition of these older buildings, even if they are not individually designated historic landmarks, represents an irreversible loss of tangible cultural heritage. It contributes to the erosion of the neighborhood's unique character, which is particularly poignant in Hollywood, an area with immense historical significance in the development of Los Angeles and the entertainment industry.

While specific prominent historical figures living at 5416-5430 W. Carlton Way were not identified through research of available public records and news archives [23, 25], the historical importance of the adjacent Hollywood Carlton Apartments and the general historical context of Hollywood itself are undeniable. Early Hollywood was characterized by large immigrant populations drawn by affordable land prices, which laid the groundwork for increased density and a vibrant community.[26] The preservation of structures from this era helps maintain the physical narrative of the neighborhood's evolution. Advocating for a Historic Preservation Overlay Zone (HPOZ) designation for the broader area, or at minimum, a thorough historic review of the entire block, could protect the neighborhood's unique character. Such designations have been shown to not only preserve architectural integrity but also lead to increased property values and foster a stronger sense of community pride among residents.[19] The demolition of these buildings would disrupt this historical continuity and undermine efforts to preserve the authentic character of Hollywood.

### **C. Developer and Property Owner Background: ROM Investments and Alchemy Planning**

The entities behind the proposed redevelopment at 5416-5430 W. Carlton Way are ROM Investments and Alchemy Planning. A closer examination of their backgrounds reveals patterns and practices that warrant scrutiny.

**ROM Investments**, identified as the property owner, is linked to Leeor Maciborski, who is described as a principal and co-founder of Eddy, a collaborative living company, and also a principal of ROM Investments.[27] ROM Investments is a real estate operating sponsor focused

on the acquisition, development, and management of "value-add" multifamily and retail properties, with a particular emphasis on the Greater Hollywood area of Los Angeles.[28, 29] Their stated strategy involves capitalizing on innovative opportunities in the Los Angeles real estate market and building a diversified portfolio.[29] ROM Investments, Inc. was founded in 1990 and operates with approximately 8 employees.[29] They claim to operate around 1,000 apartment units and 700,000 square feet of commercial space.[28]

However, a review of legal records reveals a concerning history of litigation against Davor Rom, a Florida resident, and his associated companies, including Assets Unlimited LLC, Investor Income Properties LLC (IIP), IIP Ohio LLC, IIP Akron, Property Hotline LLC, IIP Cleveland Regeneration, WC Management LLC, and Close to Home Realty LLC.[30, 31] These lawsuits, particularly *Song v. Rom* (2024-Ohio-1787) and *RUI HE v. ROM LLC LLC IIP LLC* (2018), detail allegations of fraudulent inducement, negligent misrepresentation, and violations of Ohio's Deceptive Trade Practices Act.[30, 31] In the *RUI HE* case, a jury found Rom and his companies liable on all counts, including fraudulent inducement and negligent misrepresentation, and notably, the court pierced the corporate veil of Rom's LLCs, awarding punitive damages against Rom personally.[31] The cases involved the sale and management of approximately 60 distressed properties in Ohio to Chinese nationals, who were promised high returns (10-20% ROI) and "hands-off" investment opportunities, which never materialized.[31] The *Song v. Rom* case further highlights Rom's use of multiple LLCs and "shell companies" interchangeably to facilitate sales and manage properties, with allegations of fraudulent concealment and a failure to disclose critical property issues, such as court orders related to nuisance conditions.[30, 31] The court's decision in *Song v. Rom* emphasized the principle of *res judicata*, preventing the relitigation of claims that could have been brought in prior actions, and broadly interpreted "privity" to include parties closely connected to the original defendants.[30] This extensive legal history, marked by findings of fraudulent conduct and the piercing of corporate veils, suggests a pattern of deceptive business practices and a willingness to operate through a complex web of LLCs, raising significant concerns about the transparency, ethical conduct, and long-term reliability of ROM Investments in their current Los Angeles projects.

**Alchemy Planning + Land Use**, founded and led by Gary Benjamin, serves as a land-use consulting firm for the W. Carlton Way project.[24] The firm specializes in multifamily, mixed-use, and affordable housing development in Los Angeles.[24] Gary Benjamin's professional background includes prior experience within the Los Angeles City Planning Department and as a land-use and planning advisor to a former City Councilmember for Los Angeles City Council District 13, which encompasses Hollywood and Silver Lake.[24] His firm boasts a 100% approval rate on over 130 complex entitlement approvals since 2017, including more than 80 mixed-use and multifamily projects.[24]

While direct lawsuits *against* Alchemy Planning or Gary Benjamin related to real estate development litigation in California were not identified in the provided information, Gary Benjamin has been publicly quoted discussing developers' strategies for navigating planning and permitting bureaucracies and utilizing state laws like Executive Directive 1 to build "affordable housing at no public cost".[32] He has also advised on projects within Historic

Preservation Overlay Zones (HPOZs), emphasizing the design of new buildings to blend with neighborhood character.[33] For example, he consulted on a project in Windsor Village, an HPOZ, where new units were reserved for renters earning up to 120% of the area's median income.[33] His expertise lies in maximizing project value by navigating zoning codes and land use legislation.[24] The absence of direct litigation against his firm does not diminish the broader concerns about the project's impact, particularly given his role in facilitating large-scale developments that may contribute to gentrification, even while adhering to legal minimums for affordable housing.

The combined involvement of ROM Investments, with its history of fraudulent practices and complex corporate structures, and Alchemy Planning, a firm adept at navigating regulatory frameworks to maximize development potential, creates a scenario that demands heightened scrutiny from housing justice advocates.

## **D. Legal and Regulatory Framework for Demolition and Displacement**

The proposed demolition of existing residential units at 5416-5430 W. Carlton Way triggers several critical legal and regulatory provisions designed to protect tenants and manage the impacts of development. Given the construction dates of the existing buildings (1916-1948) [4, 5], it is highly probable that these units are subject to Los Angeles's Rent Stabilization Ordinance (RSO).[1]

Under the California Tenant Protection Act (AB 1482), as amended by SB 567, a landlord must have "just cause" to evict tenants.[6, 7] Demolition or substantial remodel is considered a "no-fault" just cause for eviction.[7] However, this comes with strict requirements. The work must substantially modify or replace structural, plumbing, electrical, or mechanical systems, require permits, or involve the removal of unsafe materials, and necessitate the tenant vacating for at least 30 consecutive days.[7] The notice to terminate tenancy must include a description of the work, copies of required permits, and the expected completion date.[7]

Crucially, tenants evicted for "no-fault" reasons are entitled to relocation assistance, which must be at least one month's rent, with local jurisdictions potentially requiring more.[7] Furthermore, SB 567 introduced a "right of return" provision: if the demolition or substantial remodel does not commence or is not completed, the unit must be offered back to the tenant at the same rent and lease terms as when they left, and the tenant must be reimbursed for reasonable moving expenses.[7] This provision is a significant safeguard against speculative evictions under the guise of demolition.

Beyond state law, Los Angeles municipal code includes a "no-net loss" provision for RSO units, meaning that any demolished RSO units must be replaced on a one-to-one basis with covenanted affordable units.[9] While this aims to preserve the overall affordable housing stock, the practical implications can still lead to displacement. The new "covenanted affordable units" are subject to strict income-restriction guidelines and often have long waitlists, making them inaccessible to many of the displaced RSO tenants who previously benefited from less restrictive, lower market-rate rents.[9] This creates a scenario where the *type* of affordable housing changes, effectively pushing out existing low-income residents who may not qualify for

or be able to access the replacement units. This transformation contributes to exclusionary displacement, where changes in a gentrifying neighborhood prevent future low-income households from locating there due to prohibitive costs.[34]

The legal framework, while providing some protections, requires diligent monitoring and advocacy to ensure that developers do not exploit loopholes or minimally comply with regulations in a way that still leads to the effective displacement of vulnerable populations. The reported "right of return" and financial assistance for tenants [9, 18] must be fully realized and sufficient to genuinely mitigate the disruption and financial burden on displaced residents.

## **V. Local Housing Market Dynamics and Development Trends in ZIP Code 90027**

The housing market in ZIP Code 90027, encompassing Hollywood, is characterized by a complex interplay of new construction, varying vacancy rates, and a persistent challenge in providing truly affordable housing.

### **A. Overview of Recent and Proposed Developments**

The Hollywood area, including ZIP Code 90027, has seen a continuous stream of new construction projects. These developments often feature a mix of unit sizes and price points, predominantly catering to higher-income brackets. For instance, recent new construction homes in Los Angeles, CA 90027, include properties ranging from 3-bedroom units priced at \$849,000 to large multi-unit buildings, such as a 56-bedroom, 36,835 sq ft project at 636 N Juanita Ave listed at \$14.95 million, and a 21-bedroom, 8,278 sq ft building at 956 N Kingsley Dr for \$3.799 million.[35] These figures illustrate a market heavily skewed towards high-value properties.

Several other apartment projects in the broader Hollywood area involve demolition and subsequent new construction. For example, a proposed development at 5151 Denny Avenue in North Hollywood plans to demolish two fourplexes to construct an 80-unit affordable housing building.[36] Similarly, the Coronel Apartment Project involves the demolition of four existing two-story apartment buildings (totaling approximately 21,802 sq ft) while retaining two bungalows. The project will result in 54 dwelling units, with 53 (98%) reserved for low-income households, representing a net increase of 24 dwelling units.[37]

The proposed project at 5416-5430 W. Carlton Way fits into this trend of replacing older, smaller buildings with larger, denser developments. The plan involves replacing 25 existing homes [5] (some sources indicate 8 units at 5416 Carlton Way [4]) with 131 new units, while retaining an existing 8-unit building, for a total of 139 apartments.[18] Out of these new units, only 14 are designated as "very low-income affordable housing".[5] When comparing the number of units demolished (25) to the number of *genuinely accessible* affordable units created (14), it becomes clear that the project results in a net reduction of affordable housing options for the existing low-income population. The significant increase in market-rate units far outweighs the minimal affordable component, thereby intensifying the existing affordable housing shortage in the area.

## **B. Vacancy Rates and Affordability Benchmarks**

The Los Angeles multifamily market exhibits varied vacancy rates across different property classes. The overall vacancy rate for Los Angeles is approximately 5.1%.<sup>[38]</sup> However, this figure masks significant disparities. Luxury (4 & 5-star) properties have a considerably higher vacancy rate, at around 8.7% (down from 10% in Q2 2023).<sup>[38, 39]</sup> This indicates an oversupply in the high-end market, where many newly constructed luxury units remain empty (13.1% vacancy among luxury units built since 2020).<sup>[39, 40]</sup> In contrast, mid-range (3-star) properties have a 5.0% vacancy rate, and affordable/older inventory (1 & 2-star properties) shows the lowest vacancy, at approximately 4.3%.<sup>[38]</sup> This stark contrast highlights that while there is an abundance of high-priced, vacant units, the demand for affordable housing remains exceptionally high, leading to very tight markets for lower-cost options.

In the Hollywood submarket, the average rent as of May 2025 was \$2,904 per month.<sup>[41]</sup> More specifically, 1-bedroom apartments averaged \$2,657 per month, and 2-bedroom units averaged \$3,525 per month.<sup>[41]</sup> For the 5430 Carlton Way property itself, available 1-bedroom units are listed between \$1,650 and \$1,750.<sup>[23]</sup> The median listing home price in the 90027 ZIP code was \$2.4 million in April 2025.<sup>[42]</sup> These figures underscore the high cost of living and the significant financial barrier to housing in the area. The low vacancy rate for older, more affordable units, coupled with the high vacancy in luxury segments, indicates that new luxury construction does not alleviate the affordable housing crisis. Instead, it contributes to an oversupply in the high-end market while intensifying the competition for existing, genuinely affordable housing.

## **C. Impact of New Construction on Existing Affordability**

The proliferation of new, often luxury-oriented, construction projects in areas like Hollywood has a direct and detrimental impact on existing affordability. The presence of these high-end developments tends to inflate property values and consequently raise rents in surrounding, older buildings.<sup>[39]</sup> Property owners in neighboring, typically more affordable, structures capitalize on the area's rising prestige by increasing their rental rates, a phenomenon often referred to as the "trickle-down" effect.<sup>[39]</sup> However, in Los Angeles, where housing shortages are severe, this "trickle-down" effect is minimal and largely ineffective in creating new affordable options.<sup>[39]</sup> Instead, it primarily serves to displace current residents who can no longer afford the increased costs.

The strategic focus by developers on luxury units has led to an oversupply in that market segment, resulting in a substantial number of vacant high-end apartments.<sup>[39, 40]</sup> This imbalance exacerbates the broader affordability crisis by driving up property values and rents across the neighborhood, pushing out long-term, lower-income residents.<sup>[34, 39, 43]</sup> The proposed development at 5416-5430 W. Carlton Way, despite its limited "affordable" component, contributes significantly to this dynamic. By replacing a larger number of existing, likely RSO-protected units with a predominantly market-rate, high-density structure, it increases the overall rent pressure in the area. This leads to a de facto displacement of low-income

tenants, who are then forced to seek housing in increasingly distant and underserved areas, further straining their economic resources and social ties. The project exemplifies how development, even when incorporating minimal affordable housing requirements, can lead to a net loss of *accessible* affordability and accelerate the gentrification of established communities.

## **VI. Demographic Shifts and Socio-Cultural Impacts**

The proposed redevelopment at 5416-5430 W. Carlton Way is not merely a construction project; it is an intervention into a dynamic socio-cultural landscape, with significant implications for the demographic composition and community character of Hollywood's ZIP Code 90027.

### **A. Demographic Profile of ZIP Code 90027**

ZIP Code 90027, which includes the Hollywood neighborhood, has a population of approximately 44,471 according to Census data, or 46,049 based on the 2023 American Community Survey (ACS) 5-year estimates.[44, 45] The racial and ethnic composition of the area, according to the 2023 ACS, is predominantly White (63%), with significant Asian (12%), Other Race (10%), and Two or More Races (11%) populations. Critically, 23% of the population identifies as Hispanic.[44, 45] The median age in this ZIP code is 39 years.[44, 45]

Economically, the median household income in 90027 was \$90,532 according to the 2023 ACS.[44] However, a significant portion of households earn less, with 32% earning under \$50,000 and another 22% earning between \$50,000 and \$100,000.[45] The poverty rate in the 90027 ZIP code is approximately 10% higher than the Los Angeles-Long Beach-Anaheim Metro Area average [45], indicating a notable presence of lower-income households.

Regarding housing tenure, the data for 90027 reveals a substantial number of single adults and a comparatively small number of families and children under 18.[44] Analysis of head of household by age shows a significant disparity between renters and owners, particularly for those aged 25-34, where there are 5,701 renters compared to only 300 owners.[44] This highlights a predominantly renter-occupied area, making its residents more vulnerable to market fluctuations and displacement pressures. The recent population turnover is also evident, with 35% of residents having moved in between 2010-2017, 22% between 2018-2020, and 13% since 2021.[45] This suggests a neighborhood already experiencing considerable churn, making existing residents susceptible to further displacement.

### **B. Historical and Predicted Demographic Migration Patterns**

Los Angeles County as a whole experienced a population decrease of 1% between 2010 and 2022, contrasting with the national population growth of 7.7% and California's growth of 4.6% during the same period.[46] Within Los Angeles County, the Asian (non-Hispanic) population saw the most significant growth between 2010 and 2022, while the White (non-Hispanic) population experienced the largest decrease.[46]

Nationally, the growth of the Latino population has been primarily driven by relatively high rates of immigration and fertility, resulting in a youthful age structure.[47] In Los Angeles City, the Hispanic or Latino population constituted 47.2% in 2023.[48] Historical accounts of Hollywood in 1900 describe a community with large immigrant populations who were initially drawn to the area by affordable land prices and fertile soil, laying the foundation for increased density and development.[26] This historical context underscores the area's long-standing role as a home for diverse, often immigrant, communities seeking affordable living.

Future demographic predictions for Los Angeles County suggest continued shifts. The Southern California Association of Governments (SCAG) projects the City of Los Angeles population to grow by 8.15% between 2020 and 2030.[49] This anticipated growth, coupled with ongoing housing market pressures, indicates that existing communities, particularly those with a significant renter population and lower median incomes, will continue to face intense development pressures and the risk of demographic change driven by economic forces.

## **C. Displacement of Hispanic Residents and Contributing Factors**

Scholarly research consistently demonstrates that gentrification is characterized by an influx of higher-income, often predominantly white, residents into formerly disinvested urban neighborhoods. This process frequently leads to the direct or indirect displacement of low-income residents, with Black and Hispanic populations being particularly vulnerable.[34, 43, 50]

The 90027 ZIP code, with its 23% Hispanic population [45], is susceptible to these dynamics. More specifically, Census Tract 5416.06, which includes parts of W. Carlton Way, shows an even higher concentration of Hispanic residents (81%) and a significant poverty rate of 39.1%.[51] This demographic profile indicates a community highly vulnerable to the economic pressures associated with redevelopment.

Displacement of residents, including Hispanic populations, can manifest through various mechanisms:

- **Increased Housing Costs:** As property values and rents rise due to new, often luxury, developments, long-term residents, especially lower-income renters, find themselves unable to afford to remain in their homes.[34, 39, 43] The proposed project at W. Carlton Way, by replacing likely RSO-protected units with a larger number of market-rate units, will inevitably contribute to this upward pressure on rents in the surrounding area.
- **Tenant Harassment and Withholding of Services:** In some cases, landlords may engage in practices designed to encourage existing tenants to leave, such as harassment or failing to address maintenance issues, thereby creating uninhabitable conditions.[34]
- **Exclusionary Displacement:** Even if direct physical eviction is not widespread, changes in the neighborhood's housing stock and cost structure can prevent future low-income households from locating into the area, leading to a gradual demographic

shift.[34] The replacement of RSO units with "very low-income" units that have stricter eligibility criteria and long waitlists contributes to this exclusionary effect, as the new units do not serve the same broad segment of the low-income population.[9]

The historical trajectory of Hollywood, where early immigrant populations were drawn by affordability, suggests a pattern of development leading to increased density and subsequent displacement pressures.[26] The current project at W. Carlton Way, by accelerating the influx of higher-income residents and increasing market-rate housing supply, is likely to replicate and intensify these historical patterns, further pushing out Hispanic and other low-income communities from the area.

## **D. Broader Socio-Cultural and Economic Impacts of Gentrification**

The process of gentrification extends beyond mere demographic shifts, profoundly impacting the socio-cultural and economic fabric of a community.

- **Erosion of Social Networks and Cultural Identity:** Gentrification disrupts existing social networks and the cultural identity of original residents, leading to a pervasive sense of loss and alienation.[43] Long-standing community ties, informal support systems, and shared cultural spaces are fragmented as familiar faces and institutions disappear.
- **Transformation of Local Commerce and Services:** As wealthier, often more homogeneous, groups move into a gentrifying area, local businesses and cultural landmarks that served the original residents may be replaced by more generic, "high-end" alternatives.[43] This transformation can erase the unique character of a neighborhood, making it less accessible and less reflective of its long-term inhabitants.
- **Increased Stress and Health Impacts:** The constant threat of displacement and the rising cost of living induce significant stress among long-term residents, particularly people of color.[50] This "anticipatory stress" can have detrimental effects on both mental and physical health, contributing to a range of adverse health outcomes.[50]
- **Reinforcement of Inequalities:** The benefits often associated with gentrification, such as improved public services, enhanced infrastructure, and rising property values, are frequently not distributed equitably.[43] Wealthier newcomers tend to reap the majority of these advantages, while lower-income and minority residents bear the brunt of the costs, including displacement and the erosion of their community. This disparity reinforces existing racial and economic inequalities, exacerbating the very issues that housing justice seeks to address.[43]

The proposed development at 5416-5430 W. Carlton Way, with its significant increase in market-rate units and limited genuine affordability, is poised to accelerate these negative impacts in the immediate vicinity. It risks dismantling the existing community, increasing economic disparities, and diminishing the cultural richness that has defined the Hollywood neighborhood for decades.

## VII. Case Studies of Negative Impacts in Similar Neighborhoods

Examining past development patterns in similar urban contexts within Los Angeles provides crucial lessons about the potential negative impacts of projects like the one proposed for W. Carlton Way. These case studies highlight how even developments with stated goals of revitalization or affordable housing can lead to significant displacement and socio-cultural erosion.

**Hollywood as a Microcosm of Gentrification:** A scholarly paper analyzing Hollywood's development over the past two decades serves as a particularly relevant case study. This research indicates that despite Hollywood's stated commitment to affordable housing, the new supply of affordable units created was "too little, too late" to adequately offset the existing affordable units that were destroyed.[26] The consequence was a "large wave of gentrification," which was notably intensified around transit stations.[26] The study concludes that it is "highly probable that a sizable population was displaced in Hollywood" as a direct result of these development trends.[26] This outcome occurred despite Hollywood not experiencing the typical increase in Caucasian population often associated with displacement, suggesting that displacement can manifest in complex ways beyond simple racial turnover.[26] The paper emphasizes that if Los Angeles fails to meet its need for affordable housing, it risks losing the diversity that defines it, becoming a "sterile, inefficient, unsustainable, and undesirable place to live".[26] This historical analysis of Hollywood directly mirrors the concerns raised by the W. Carlton Way project, which is also located near a transit station and proposes a minimal affordable component while demolishing existing units.

**The Case of South Central Los Angeles:** Another compelling example of how urban policy can contribute to cultural displacement and gentrification is the renaming of South Central Los Angeles to South Los Angeles in 2003. While framed by the city as an effort to "clean up an image" and rebuild a working-class community, many long-term residents viewed this change as "another stage in displacement, an erasure of our home as we knew it".[52] This case illustrates that even seemingly benign or image-focused urban interventions can have profound socio-cultural impacts, ultimately benefiting external interests and contributing to rising homelessness and displacement.[52] The narrative of "cleaning up" a neighborhood's reputation through gentrification, while homelessness and displacement continue to rise, highlights a fundamental disconnect between stated policy goals and lived community experiences.[52]

**Broader Patterns of Gentrification and Displacement:** Research extending to other gentrifying areas in Los Angeles (such as Downtown, Santa Monica, and Venice) and even international cities like London, further illuminates the pervasive impacts of gentrification. These studies demonstrate the displacement of critical social services due to rising property values, rendering them inaccessible to the vulnerable populations they serve.[53] The literature also delves into the concept of "anticipatory stress" among residents of color, a psychological burden stemming from the fear of displacement, which is often compounded by racial tension and the policing of Black and Hispanic residents.[50] Furthermore, attempts to rebrand neighborhoods

to distance them from their original low-income communities of color are a common feature of gentrification.[50]

These case studies collectively underscore a critical point: urban development, particularly large-scale projects that replace existing affordable housing with predominantly market-rate units, carries a high risk of negative consequences for incumbent communities. Even when affordable housing components are included or when projects are framed as revitalization efforts, they can lead to significant displacement, increased cost of living, erosion of neighborhood identity, and heightened social and economic inequalities. The proposed development at 5416-5430 W. Carlton Way, given its characteristics and location, is highly likely to replicate these documented negative impacts, making the lessons from these past experiences directly applicable and a strong argument for re-evaluating the project's true community benefit.

## **VIII. Conclusions and Recommendations**

The proposed redevelopment at 5416-5430 W. Carlton Way by ROM Investments and Alchemy Planning represents a critical juncture for housing justice in the Hollywood neighborhood. A comprehensive analysis of the site's historical context, the developer's track record, local market dynamics, and socio-cultural impacts reveals a project that, despite its claims of providing affordable units, is poised to exacerbate the existing housing crisis, displace vulnerable tenants, and erode the unique character of the community.

The existing buildings at 5416-5430 W. Carlton Way, constructed between 1916 and 1948, are highly likely to be protected under the Rent Stabilization Ordinance (RSO). Their demolition would result in the loss of 25 existing homes, replaced by a mere 14 "very low-income" units out of 131 new apartments. This constitutes a significant net loss of accessible affordable housing, as the new units are unlikely to serve the same low-income population currently residing in the RSO-protected properties. This outcome highlights how density bonus incentives, while intended to promote affordability, can be leveraged to maximize market-rate development under the guise of meeting affordable housing goals, leading to de facto displacement and increased gentrification.

Furthermore, the site holds contextual historical significance, being adjacent to the designated Hollywood Carlton Apartments (5400 W Carlton Way), a historic resource designed by Edith Northman, the first female registered architect in Los Angeles. The demolition of these older structures would contribute to the irreversible loss of the neighborhood's architectural and cultural heritage. The concerning legal history of ROM Investments, marked by findings of fraudulent inducement and the piercing of corporate veils in other states, raises serious questions about their operational integrity and commitment to ethical development practices in Los Angeles.

The demographic profile of ZIP Code 90027, with its substantial renter population and significant Hispanic community, indicates a high vulnerability to displacement pressures.

Historical and contemporary case studies from Hollywood and South Central Los Angeles demonstrate how similar development patterns have consistently led to tenant displacement, increased rents, and the erosion of community identity, often disproportionately affecting low-income and minority residents. The proposed project threatens to replicate these negative impacts, intensifying economic disparities and fragmenting existing social networks.

Based on this comprehensive analysis, the following recommendations are put forth to safeguard the existing community, promote genuine affordability, and ensure equitable urban development:

**1. Preservation and Enhanced Historic Review:**

- Advocate for a formal historic-cultural monument designation or inclusion in an HPOZ for 5416-5430 W. Carlton Way, given its contextual significance and proximity to a designated historic resource.
- Demand a thorough historic review process for the entire block that considers the collective architectural and cultural contributions of the existing structures, ensuring that any future development respects and integrates with the neighborhood's established character.

**2. Strengthened Tenant Protections and Equitable Replacement Housing:**

- Demand that all Rent Stabilization Ordinance (RSO) units on the site be replaced on a one-to-one basis with *genuinely affordable* units that are truly accessible to the current tenants' income levels. This requires moving beyond minimal "very low-income" set-asides to ensure that the replacement housing meets the specific affordability needs of the displaced population.
- Ensure robust enforcement of the California Tenant Protection Act (AB 1482/SB 567), including comprehensive relocation assistance that covers all moving costs and potential rent differentials for a significant period.
- Insist on a binding and enforceable "right of return" provision that guarantees displaced tenants the option to return to comparable units in the new development at their previous RSO-controlled rents, should the project not proceed as planned or fail to meet its stated affordable housing commitments.

**3. Community-Led Development Alternatives and Moratorium:**

- Advocate for a moratorium on the demolition of RSO units at 5416-5430 W. Carlton Way until a community-led planning process can be initiated. This process should explore alternative development models that prioritize preservation, deep affordability, and community stability over profit maximization.
- Support community land trusts or non-profit housing developers to acquire and rehabilitate existing affordable housing stock, ensuring long-term affordability and community control.

**4. Rigorous Environmental and Social Impact Review:**

- Demand a full Environmental Impact Report (EIR) under CEQA for the proposed project. This EIR must comprehensively assess not only the physical environmental impacts but also the significant social, economic, and cultural impacts, including detailed analyses of tenant displacement, increased traffic congestion, strain on local public resources (schools, infrastructure), and the

erosion of neighborhood character.

**5. Increased Accountability for Developers:**

- Call for heightened scrutiny of developers with problematic legal histories, such as ROM Investments. Past findings of fraudulent activities and the use of complex corporate structures should be thoroughly considered during all stages of permit and entitlement reviews by city planning and building departments.
- Advocate for policies that penalize developers who engage in deceptive practices or fail to adhere to their stated commitments, particularly concerning affordable housing and tenant protections.

**6. Broader Policy Advocacy for Equitable Development:**

- Urge city and state policymakers to re-evaluate existing density bonus and Transit Oriented Communities (TOC) programs. These programs must be reformed to ensure they genuinely serve the goal of increasing deeply affordable housing and include stronger anti-displacement measures, rather than inadvertently facilitating market-rate development that displaces existing communities.
- Advocate for inclusionary zoning policies that mandate higher percentages of affordable units and deeper levels of affordability in all new developments, especially in gentrifying areas.
- Support and empower existing tenants and neighborhood residents through sustained organizing efforts, providing them with legal resources, technical assistance, and platforms to voice their concerns and shape the future of their community.

By implementing these recommendations, Los Angeles can move towards a more equitable and sustainable model of urban development that prioritizes the well-being of its long-term residents and preserves the unique cultural and historical fabric of its diverse neighborhoods.

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## Communication from Public

**Name:** Vidais Lovette

**Date Submitted:** 09/05/2025 06:16 PM

**Council File No:** 25-0811

**Comments for Public Posting:** 1. I oppose this proposed development because it: 2. Would result in the loss of much-needed rent-stabilized/affordable housing in East Hollywood and harm the local community 3. Does not comply with the laws: 4. This project is noncompliant with State Bill CA SB8, noncompliant with California's "No Net Loss" law, noncompliant with Los Angeles Resident Protection Ordinance RPO, noncompliant with SNAP, the Station Neighborhood Area Plan, and last but not least, noncompliant with CEQA, the California Environmental Quality Act. 5. Does not create any new affordable housing in the community; instead, it would displace long-standing tenants and worsen the city's housing crisis This plan does not align with the city's planning goals to create more affordable housing in Los Angeles, and in fact works against them Simply put, I've been living in my unit for almost a half-century and cannot afford to nor do I want to move! This is MY HOME!!

COUNCIL FILE NO: 25-0811

CASE NO: CPC-2024-914-DB-SPPC-VHCA

CEQA: ENV-2024-915-CE

Plan Area: Hollywood

Council District: 13 - Soto-Martinez

Project Site: 5416 - 5418, 5420, 5424-5428 and 5430 West Carlton Way Los Angeles, CA 90027

Honorable Chair Blumenfield and members of the PLUM Committee,

I am writing in support of the Carlton Serrano Tenants Association Appeal.

I've been living here at 5420 ½ Carlton Way since 1982...it is now 2025, which is almost a half CENTURY! This is MY home and I will not be able to afford, nor do I want to move to another apartment at 70 years of age!! I've always paid my rent on time and have NEVER asked for ANY upgrades to this unit! I am happy the way it is as long as things WORK! Sometimes QUALITY is better than QUANTITY!! Building a large apartment complex on this lot will CERTAINLY destroy the quality of life in this community...I am SURE of this too!

As a constituent, I oppose this development, which seeks the demolition of seven rent-controlled (RSO) apartment buildings and the eviction and displacement of nearly fifty vulnerable tenants. This project is noncompliant with State Bill CA SB8, noncompliant with California's "No Net Loss" law, noncompliant with the Los Angeles Resident Protection Ordinance RPO, noncompliant with the Station Neighborhood Area Plan (SNAP) Subarea A, and last but not least, noncompliant with CEQA.

We must preserve our existing affordable housing stock. Unless decision-makers understand that we need to do both, preserve and produce, we will be doomed to a failed housing policy, and our crisis will get worse. The project's proposed 15 "Very Low Income" units, while seemingly beneficial, do not adequately compensate for the demolition of 25 existing naturally-occurring low-income RSO units. Currently, there are only 15 units (10.8% of the apartments proposed) reserved as affordable. If new RSO units are set at market-rate prices, this does not create more affordable housing. In fact, it has the opposite effect, essentially gentrifying the original residents of the neighborhood. This project results in a net loss of 10 affordable RSO units. The developer's extensive reliance on off-menu waivers - including a 176% height increase and 74% reduction in open space - reflects a clear attempt to maximize private profit by circumventing zoning and design standards intended to protect neighborhood livability. This approach undermines the fundamental purpose of density bonus laws, which are intended to encourage affordable housing, not to facilitate luxury development at the expense of established community standards and quality of life.

Specific Plan Project Compliance (SPPC) Findings for this project are erroneous. Because a waiver has been granted does not mean that the proposed development is compliant. SNAP was created to prevent developments like this from intruding on our community and low-scale residential neighborhoods. To say that this project is compliant is against the very principle of SNAP itself, particularly in the most restrictive area, Subarea A. SNAP was created to preserve our existing communities.

The removal of 17 trees, including two native, protected California Oaks, violates LA's Protected Tree Ordinance and invalidates the CEQA Class 32 exemption. In a neighborhood facing severe heat exposure and high asthma rates, these trees provide vital ecosystem services: cooling, stormwater absorption, air filtration, and public health protection. Their destruction would constitute a significant environmental impact under CEQA and must trigger a full Environmental Impact Report (EIR).

CEQA's mandate to consider historic resources, even if they only have "contextual" or "associative" value, must be addressed. These buildings, some built between 1916–1948, have a unique character and charm that is irreplaceable and unmistakably classic Hollywood. They are part of a charming historic cluster adjacent to the Edith Northman-designed Hollywood Carlton Apartments. Edith Northman is the first female registered architect in Los Angeles; demolishing these units would degrade the historic fabric of this block and potentially violate CEQA's protections for contextual historic resources. These historic apartments should be preserved.

Additionally, the developers are bad actors. ROM Investments has a documented history of tenant harassment, code violations, unresponsiveness, and aggressive rent hikes. There are also documented fines against Leor Maciborski for illegal campaign contributions and his consultant, Gary Benjamin, for failing to report lobbying. This dubious history is a significant finding and raises serious questions about their operational integrity and commitment to fair practices.

Please support the appeal of the Carlton Serrano Tenants Association and do not allow this development to move forward.

I am counting on you to side with the people, not bad actor developers and their unethical consultants.

Sincerely,

Vidaís Lovette