Fwd: Carlton Way Appeal - Substantial Evidence, COUNCIL FILE NO: 25-0811

1 message

Office of the City Clerk <cityclerk@lacity.org> Tue, Sep 16, 2025 at 8:17 AM
To: City Clerk Council and Public Services <clerk.cps@lacity.org>

---------- Forwarded message ---------
From: **Jesse Molloy** <jessemolloy2@gmail.com>
Date: Mon, Sep 15, 2025 at 6:05 PM
Subject: Carlton Way Appeal - Substantial Evidence, COUNCIL FILE NO: 25-0811
To: <councilmember.blumenfield@lacity.org>, <cd10@lacity.org>, <heather.hutt@lacity.org>, <Councilmember.Nazarian@lacity.org>, <councilmember.Lee@lacity.org>, <contactCD4@lacity.org>, <councilmember.soto-martinez@lacity.org>, <councilmember.hernandez@lacity.org>, <councilmember.yaroslavsky@lacity.org>, <councilmember.padilla@lacity.org>, <councilmember.rodriguez@lacity.org>, <councilmemberharris-dawson@lacity.org>, <councilmember.price@lacity.org>, <councilmember.park@lacity.org>, <councilmember.jurado@lacity.org>, <councilmember.mcoskar@lacity.org>
Cc: <CityClerk@lacity.org>, <controller.mejia@lacity.org>, <carltonserranotenants@gmail.com>

Dear Los Angeles City Council,

I'm writing in regards to the Carlton Way Project. Displacing longtime residents who rely on this low income housing is deplorable at best, criminal at worst. Tenants that have lived here for generations make up the lifeblood of our communities and evicting them on, frankly, an illegal basis, is wrong.

This project is not legal, and we urge the council to save taxpayer funds to avoid yet another litigation the public will be forced to file. Blindly rubber-stamping this off-kilter disaster would be embarrassing and shameful for the Council.

As the appellants, we state our objections to this illegal project for inclusion in the record. Many tenants in the affected buildings and surrounding neighborhoods of 90027, 90028, 90029, and beyond have contacted Councilmember Hugo Soto-Martinez's office multiple times, making him aware of the united and strong opposition among tenants and neighbors to oppose this project.

- The planning department's navigating of shortcuts with the applicant to try to pass this project off as legal is malicious, fraudulent, and criminal.
- This is a non-compliant commercial proposal being dropped in a SNAP zone, with no comparable buildings in the vicinity. All fifteen of you would be removing RSO units from the net stock, leaving our communities in disarray, which will last long after your terms are up.
- We ask for a single dissenting voice, an independent thinker who can read between the lines and see that something is not kosher about this project. Please see public comment from yesterday's PLUM hearing for irrefutable evidence that this project is noncompliant.
- The city planners assigned to this case have demonstrated that they are inexperienced in reading plans. The plans are rife with typos, mathematical errors, inconsistencies, and contradictions. This

should be considered an embarrassment, especially when considering displacing vulnerable tenants and demolishing seven rent-controlled apartment buildings in favor of a luxury high-rise.

- The developer is receiving a forty-six (46) unit density bonus, failing to provide grounds, and seven (7) unnecessary waivers proven to be harmful to the community.
- The DCP has failed to justify said waivers. The State Density Bonus law allows waivers when physical compliance is "precluded" - meaning impossible.
- This project can easily accommodate more low-income units in the area, if not for the private pool and “resident co-work space” - 45,000 square feet of unused space that would serve no one.
- This waiver law is wrongly being accepted here as density bonus waivers.
- The developer Leoor Maciborksi’s consultant, Gary Benjamin of Alchemy Planning and Land Use (who was fined $37K by LA Ethics Commission in 2019), has repeatedly lied to this commission, claiming to have spoken with all of the affected tenants, which is a straight-up lie. Maciborksi himself was fined $17K by the LA Ethics Commission in 2017)

How many councilmembers believe that all of these ingredients amount to an ethical, transparent, and positive impact on our neighborhood in East Hollywood?

I urge you to support the Carlton Serrano Tenants Association Appeal and reject this proposed development, which would demolish seven rent-controlled buildings, displace nearly fifty vulnerable tenants, and result in a net loss of naturally occurring low-income RSO housing.

The project is noncompliant with SB8, “No Net Loss,” the Resident Protection Ordinance (RPO), SNAP Subarea A, and CEQA. **Failing to comply with SB8 is grounds for project rejection, and accordingly, this project must be denied.**

Replacing 25 existing RSO units with only 15 “Very Low Income” units (just 10.8% of the total) fails to justify the destruction of naturally occurring low-income RSO housing and promotes gentrification.

The use of off-menu waivers for a 176% height increase and 74% open space reduction prioritizes profit over community standards. The claim that the project complies with SNAP is flawed, especially in Subarea A. SNAP was specifically designed to protect quality of life and to prevent invasive noncompliant projects like this from occurring.

The removal of 17 trees, including two protected California Oaks, violates the Protected Tree Ordinance and necessitates a full Environmental Impact Report. Additionally, the site includes historic buildings with contextual value near the Edith Northman-designed Carlton Apartments, and their demolition would erode the area's historic fabric.

The developers, ROM Investments and their affiliates, have a documented history of tenant harassment, code violations, and unethical conduct, further underscoring why this project should not proceed. **Tenant harassment, such as ROM Investments documented cases of refusing to conduct repairs violates the Housing Crisis Act (SB8), the Housing Crisis Act Replacement Unit Determination (RUD) and the**

Resident Protection Ordinance (RPO). As this development project is noncompliant, it must be denied.

In over 1,000 pages of this Case, nowhere are 35,00 – 40,000 sf “unassigned” “co-working” (non-apartment) spaces explained. **State Density Bonus law requires proving that waivers enable affordable housing. The Off Menu Incentives and Waivers requested here are insupportable under Density Bonus law.**

Failing to comply and failing to disclose the purpose of 35,000 – 40,000 sq feet of non-housing is grounds for project rejection; therefore, this project must be denied. This is irrefutable evidence of the manipulation and abuse of the Density Bonus Law, including unnecessary luxury amenities, which have nothing to do with the "No Net Loss", per unit replacement of 25 RSO units.

The “unassigned, co-working” spaces are not “necessary” and are entirely unrelated to low-income housing. They cannot be used to justify waiver requests. The Department of City Planning (DCP) omits these sections and fails to describe them in its Letter of Determination, (LOD). **This project must be denied.**

Replacing 25 existing RSO units with only 15 “Very Low Income” units fails to justify the destruction of 25 existing naturally occurring low-income RSO units. We must preserve our existing affordable housing stock. Decision-makers must understand that we need to do both, preserve and produce.

This is not an apples-to-apples replacement of genuinely affordable RSO housing. There needs to be a clear and precise distinction between existing RSO housing and market-rate luxury housing. Replacing 25 RSO units with only 15 low-income units is, in reality, not equivalent. **Therefore, this development is noncompliant with the Housing Crisis Act (SB8) and the Housing Crisis Act Replacement Unit Determination (RUD).**

Please side with the community, not bad actors, and support the tenants' appeal.

Sincerely,
Jesse

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Jesse Molloy
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