

Communication from Public

Name: Jason Enright

Date Submitted: 08/26/2025 02:26 PM

Council File No: 25-0812

Comments for Public Posting: Dear Council, My name is Jason Enright. I live in north Hollywood California CD2. I write to express my deep concern with the Los Angeles Housing Department's (LAHD) recent report back on the Rent Escrow Account Program (REAP) and the Systematic Code Enforcement Program (SCEP). According to LAHD's Report Dashboard for Code Inspections, in the past 10 years (between 7/15/2015–08/25/25) there have been 104,265 inspections performed, resulting in 42,934 violations cited. It also shows that at this time, there are 3,335 active violation cases. These numbers underscore the importance of REAP and SCEP to hold slumlords accountable and ensure tenants have safe and habitable housing. However, these programs need to be stronger, and more tenant centered. The report fails to address key aspects of our requests and leaves gaps that continue to leave tenants vulnerable. Without proper action, abusive landlords will keep exploiting these weaknesses.

Key Concerns and Recommendations

SCEP Notice of Inspections: Tenants must receive clear, advance notice with exact inspection dates and times. Outreach and information should be conducted ahead of inspections for tenants and landlords to understand what is to be expected.

Adequate Repairs: Require verification photos to confirm quality repairs, and ensure repairs are done by professionals.

Prevent Inspection Delays: SCEP should provide notice in addition to landlords to tenants so that landlords have less ability to sabotage access.

Language Justice: Notice, reports and inspections must be distributed and conducted in the tenant's primary language.

Fines: Landlords should face escalating fines for repeated violations. Fines should be issued relative to severity of violations. Prosecution should result from ongoing problems.

Tenant Habitability Plans: These must be required whenever tenants need to be relocated for repairs as a result of inspection orders.

Tenant Petition Process: The city should create a process so tenants can file petitions with the Rent Adjustment Commission to decrease their rents if a landlord fails to make necessary repairs.

REAP Eviction Protections: Tenants in REAP buildings must have an affirmative defense against eviction.

Proof of Repairs: Require landlords to submit receipts and before-and-after photos before removal from REAP.

Escrow Funds: Tenants should have faster, direct access to escrow

accounts for emergency repairs. Inspection Frequency: Problem properties require more inspections, including neighboring units to ensure holistic inspections of buildings. Backlog: Extra staffing alone will not resolve systemic delays, structural reforms are needed. As of March 2025, LAHD data showed over 350 cases had remained in REAP for two or more years. On average, buildings stay in REAP for four-and-a-half years, and 35 cases have exceeded 15 years. Fines and Fees: Penalties should scale with severity and duration of violations, not be written off as a cost of doing business. Appeals: Timelines must be shortened, with rent reductions allowed during the appeal process. Outreach: Assess effectiveness and ensure language access in all materials. LA tenants have advocated for years to strengthen REAP and SCEP. The current report back is too vague, and fails to adequately address gaps in a system meant to protect tenants. I urge the Council to adopt these recommendations so these programs can truly protect tenants, hold landlords accountable, and ensure Angelenos live in safe and healthy homes. Sincerely, Jason Enright

Communication from Public

Name: Iris Craige

Date Submitted: 08/26/2025 02:33 PM

Council File No: 25-0812

Comments for Public Posting: August 26, 2025 TO: LA City Council FROM: Keep LA Housed Coalition RE: Council File: 25-0812 Subject: Systematic Code Enforcement Program (SCEP) / Proactive Inspection Program / Complaint-Based Inspections / Rent Escrow Account Program (REAP) / Compliance Procedures / Rental Properties Dear Members of the Los Angeles City Council, On behalf of the Keep LA Housed Coalition (KLAH) and allied residents across Los Angeles, we write to express our deep concern with the Los Angeles Housing Department's (LAHD) recent report back on the Rent Escrow Account Program (REAP) and the Systematic Code Enforcement Program (SCEP). According to LAHD's Report Dashboard for Code Inspections, in the past 10 years (between 7/15/2025–08/25/25) there have been 104,265 inspections performed, resulting in 42,934 violations cited. It also shows that at this time, there are 3,335 active violation cases. These numbers underscore the importance of REAP and SCEP to hold slumlords accountable and ensure tenants have safe and habitable housing. However, these programs need to be stronger, and more tenant centered. The report fails to address key aspects of our requests and leaves gaps that continue to leave tenants vulnerable. Without proper action, abusive landlords will keep exploiting these weaknesses. Key Concerns and Recommendations SCEP Notice of Inspections: Tenants must receive clear, advance notice with exact inspection dates and times. Outreach and information should be conducted ahead of inspections for tenants and landlords to understand what is to be expected. Adequate Repairs: Require verification photos to confirm quality repairs, and ensure repairs are done by professionals. Prevent Inspection Delays: SCEP should provide notice in addition to landlords to tenants so that landlords have less ability to sabotage access. Language Justice: Notice, reports and inspections must be distributed and conducted in the tenant's primary language. Fines: Landlords should face escalating fines for repeated violations. Fines should be issued relative to severity of violations. Prosecution should result from ongoing problems. Tenant Habitability Plans: These must be required whenever tenants need to be relocated for repairs as a result of inspection orders. Tenant Petition Process: The city should create a process so tenants can file petitions with the Rent Adjustment Commission to decrease their rents if a

landlord fails to make necessary repairs. REAP Eviction Protections: Tenants in REAP buildings must have an affirmative defense against eviction. Proof of Repairs: Require landlords to submit receipts and before-and-after photos before removal from REAP. Escrow Funds: Tenants should have faster, direct access to escrow accounts for emergency repairs. Inspection Frequency: Problem properties require more inspections, including neighboring units to ensure holistic inspections of buildings. Backlog: Extra staffing alone will not resolve systemic delays, structural reforms are needed. As of March 2025, LAHD data showed over 350 cases had remained in REAP for two or more years. On average, buildings stay in REAP for four-and-a-half years, and 35 cases have exceeded 15 years. Fines and Fees: Penalties should scale with severity and duration of violations, not be written off as a cost of doing business. Appeals: Timelines must be shortened, with rent reductions allowed during the appeal process. Outreach: Assess effectiveness and ensure language access in all materials. LA tenants have advocated for years to strengthen REAP and SCEP. The current report back is too vague, and fails to adequately address gaps in a system meant to protect tenants. We urge the Council to adopt these recommendations so these programs can truly protect and center tenants, hold landlords accountable, and ensure Angelenos live in safe and healthy homes. Sincerely, Keep LA Housed Coalition



August 26, 2025

TO: LA City Council

FROM: Keep LA Housed Coalition

RE: [Council File: 25-0812](#)

Subject: Systematic Code Enforcement Program (SCEP) / Proactive Inspection Program / Complaint-Based Inspections / Rent Escrow Account Program (REAP) / Compliance Procedures / Rental Properties

Dear Members of the Los Angeles City Council,

On behalf of the Keep LA Housed Coalition (KLAH) and allied residents across Los Angeles, we write to express our deep concern with the Los Angeles Housing Department's (LAHD) recent report back on the Rent Escrow Account Program (REAP) and the Systematic Code Enforcement Program (SCEP).

According to LAHD's Report Dashboard for Code Inspections, in the past 10 years (between 7/15/2015–08/25/25) there have been 104,265 inspections performed, resulting in 42,934 violations cited. It also shows that at this time, there are 3,335 active violation cases.¹ These numbers underscore the importance of REAP and SCEP to hold slumlords accountable and ensure tenants have safe and habitable housing. However, these programs need to be stronger, and more tenant centered. The report fails to address key aspects of our requests and leaves gaps that continue to leave tenants vulnerable. Without proper action, abusive landlords will keep exploiting these weaknesses.

Key Concerns and Recommendations

SCEP

- **Notice of Inspections:** Tenants must receive clear, advance notice with exact inspection dates and times. Outreach and information should be conducted ahead of inspections for tenants and landlords to understand what is to be expected.
- **Adequate Repairs:** Require verification photos to confirm quality repairs, and ensure repairs are done by professionals.

¹ Data from LAHD Report Dashboard for Code Inspections, August 2025

- **Prevent Inspection Delays:** SCEP should provide notice in addition to landlords to tenants so that landlords have less ability to sabotage access.
- **Language Justice:** Notice, reports and inspections must be distributed and conducted in the tenant's primary language.
- **Fines:** Landlords should face escalating fines for repeated violations. Fines should be issued relative to severity of violations. Prosecution should result from ongoing problems.
- **Tenant Habitability Plans:** These must be required whenever tenants need to be relocated for repairs as a result of inspection orders.
- **Tenant Petition Process:** The city should create a process so tenants can file petitions with the Rent Adjustment Commission to decrease their rents if a landlord fails to make necessary repairs.

REAP

- **Eviction Protections:** Tenants in REAP buildings must have an affirmative defense against eviction.
- **Proof of Repairs:** Require landlords to submit receipts and before-and-after photos before removal from REAP.
- **Escrow Funds:** Tenants should have faster, direct access to escrow accounts for emergency repairs.
- **Inspection Frequency:** Problem properties require more inspections, including neighboring units to ensure holistic inspections of buildings.
- **Backlog:** Extra staffing alone will not resolve systemic delays, structural reforms are needed. As of March 2025, LAHD data showed over 350 cases had remained in REAP for two or more years. On average, buildings stay in REAP for four-and-a-half years, and 35 cases have exceeded 15 years.²
- **Fines and Fees:** Penalties should scale with severity and duration of violations, not be written off as a cost of doing business.
- **Appeals:** Timelines must be shortened, with rent reductions allowed during the appeal process.
- **Outreach:** Assess effectiveness and ensure language access in all materials.

LA tenants have advocated for years to strengthen REAP and SCEP. The current report back is too vague, and fails to adequately address gaps in a system meant to protect tenants. We urge the Council to adopt these recommendations so these programs can truly protect and center tenants, hold landlords accountable, and ensure Angelenos live in safe and healthy homes.

Sincerely,

Keep LA Housed Coalition

² Data provided by LAHD, March 2025

Communication from Public

Name: Fred Sutton

Date Submitted: 08/26/2025 03:21 PM

Council File No: 25-0812

Comments for Public Posting: Attached, please find a letter from the California Apartment Association regarding this item.



California Apartment Association
4401 Atlantic Ave. Suite 200
Long Beach, CA 90807

August 26th, 2025

The Honorable Chair Raman
Housing Committee
City of Los Angeles
VIA Email

Re: (Item 5) REAP and SCEP Enhancements (CF [25-0812](#))

Dear Committee Members,

The California Apartment Association (CAA) represents housing providers across Los Angeles from owners of a single unit to operators of large apartment communities, as well as the businesses that support the rental housing industry. CAA recognizes its ethical duty to the communities we serve and upholds the highest standards of integrity in the multifamily housing field. We appreciate being included in stakeholder meetings on the City's enforcement programs and value the City's efforts to streamline these processes.

We welcome enhancements that facilitate and expedite compliance. We support the use of technology and departmental alignment to achieve faster removal from REAP, clearer compliance guidance to avoid repeat violations, and the increase in staffing to reduce hearing backlogs. Good faith operators should have a straightforward path to rectify errors, while ensuring bad actors are held accountable.

At the same time, we urge the Committee to consider the following concerns:

1. **Resident-Caused Violations:** There should be provisions to account for issues caused by residents. In some cases, the resident, *not* the housing provider, is the source of continued code or safety violations. In some instances, providers are prevented from remedying the issue. Safeguards should be established to ensure the inspection and REAP process cannot be weaponized as part of a landlord-tenant dispute.
2. **Proactive Escrow Notifications:** It is our understanding that owners are not consistently notified whether funds are being deposited into Escrow. LAHD should implement a proactive reporting mechanism to inform housing providers of escrow deposits. Operators can be left unaware of whether rents are being collected while compliance is being sought. If a resident is not paying the reduced rent or into the escrow account, an accountability mechanism should be put in place.
3. **Inspection Tier Improvements:** We encourage the City to consider expanding its risk-based inspection model. Properties with strong compliance records should benefit from longer inspection timeframes and lower fees, while City resources are concentrated on non-compliant or higher-risk properties in Tier II.

We appreciate the opportunity to provide feedback and look forward to continued collaboration with the City.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Sutton", with a long horizontal flourish extending to the right.

Fred Sutton
California Apartment Association