

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

651 Bannon Street
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



April 20, 2026

Vincent P. Bertoni, Director of Planning
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Dear Vincent Bertoni:

**RE: City of Los Angeles – Approval of Valley Glen Interim Control Ordinance
Demolition Restrictions for RSO Units**

This letter provides a determination to the City of Los Angeles (City) regarding the request to approve an Interim Control Ordinance (ICO) to temporarily prohibit the issuance of demolition permits for occupied residential dwelling units that are or were subject to any form of rent or price control in a portion of the Valley Glen community. The ICO will stay in effect until the Department of City Planning (Planning) and the Los Angeles Housing Department (LAHD) can study possible new amendments, regulation, or administrative issues to reconcile the City's Rent Stabilization Ordinance (RSO) procedures with Resident Protection Ordinance (RPO).

The California Department of Housing and Community Development (HCD) is statutorily required to provide a determination regarding a proposed moratorium or other restrictions or limitations on housing development.¹ HCD received a request for approval of the proposed ICO, met with City Staff, and reviewed relevant materials (e.g., proposed ICO, City's ICO staff report, etc.). Upon review of the written materials and discussion with the local jurisdiction, HCD has determined that the demolition provisions for occupied RSO units and other affordable units subject to any form of price control in the ICO comply with Government Code section 66300, subdivision (i), of the Housing Crisis Act (HCA) by intending to preserve existing affordable housing for lower-income households and units subject to rent control.

HCD notes that the ICO provisions regarding the Valley Glenn community are narrowly tailored, applying only within the specific parameters outlined below:

¹ Gov. Code, § 66300, subd. (b)(1)(B)(ii).

- Housing type – Only RSO units and covenanted affordable units
- Geography – Applicable only within an approximately 35-acre portion of the Valley Glen community within the Van Nuys-North Sherman Oaks Community Plan are, roughly including multi-family buildings along Woodman Avenue between Orange (G) Line right-of-way on the north and Hatteras Street on the south and along Oxnard Street between Hazeltine Avenue on the west and Orange (G) Line right-of-way on the east.
- Project types – Pertains only to demolition permits for RSO units and covenanted affordable units
- Timeline – ICO would be in effect for no more than 45 days and may be extended for a 10-month and 15-day period, which can be further extended for an additional year pursuant to Government Code section 65858. Per statute, no additional extensions are permitted beyond the two-year timeline.

Background

HCD understands that a rental unit may be subject to the City's RSO if the property was built on or before October 1, 1978. Additionally, units constructed after July 15, 2007, that replace demolished RSO units may also be covered under the RSO. The RSO covers allowable rent increases, registration of rental units, legal reasons for eviction, types of evictions requiring payment of tenant relocation assistance, RSO disclosure notice for all "cash for keys" or buyout agreements, and interest payments on security deposits.

HCD also understands that the City adopted a RPO in 2024 with the goal of strengthening citywide tenant protections for individuals facing evictions due to redevelopment, as well as to impose requirements on housing developments that include deed-restricted affordable housing units. The ICO would place a temporary moratorium on demolitions of price-controlled units in the subject area until LAHD can reconcile the RSO procedures with the RPO and its guarantees. More specifically, City Council has asked LA City Planning and LAHD to provide greater clarity for tenants regarding when the demolition of occupied residential dwelling units can be expected to occur.

Exceptions to Prohibition on a Moratorium of Similar Restrictions on Housing Developments Under the HCA

Pursuant to Government Code section 66300, subdivision (b)(1)(B)(ii), an affected city cannot enact a development policy, standard, or condition that would impose a moratorium or other restrictions that would limit housing development until it has submitted the ordinance to and received approval from HCD. Should HCD deny the ordinance, that development policy shall be deemed void.

The HCA contains two exceptions to the prohibition on a moratorium or similar restriction:

- 1) Government Code section 66300, subdivision (b)(1)(B)(i): The conditions must demonstrate “an imminent threat to the health and safety of persons residing in, or within the immediate vicinity of, the area subject to the moratorium....”
- 2) Government Code section 66300, subdivision (i): “Notwithstanding subdivisions (b) and (e), this section does not prohibit an affected city or an affected county from enacting a development policy, standard, or condition that is intended to preserve or facilitate the production of housing for lower income households, as defined in Section 50079.5 of the Health and Safety Code, or housing types that traditionally serve lower income households, including mobile home parks, single-room occupancy units, or units subject to any form of rent or price control through a public entity’s valid exercise of its police power.”

The ICO is Intended to Preserve Housing for Lower-Income Households in a Portion of the Valley Glen Community, Consistent with the HCA

While the exception under Government Code section 66300, subdivision (b)(1)(B)(i), requires specific health and safety findings, Government Code section 66300, subdivision (i), does not. This second provision allows a city to impose a moratorium or restriction on housing development if the intention of the proposed policy, standard, or condition is to be more protective of specific types of affordable housing, including housing for lower-income households and rent-controlled housing.

Government Code section 66300, subdivision (i), includes “lower income households as defined in Section 50079.5 of the Health and Safety Code,” “housing types that traditionally serve lower income households,” and “units subject to any form of rent or price control.” The ICO is focused on housing types that meet the definition of a unit subject to any form of rent or price control. Therefore, the ICO’s proposed prohibition on demolition permits specifically for units under rent or price control meets the requirements of subdivision (i).

Additionally, the City has narrowed the ICO’s provisions to apply only in a small geographic area within the Valley Glen community, and only temporarily until the City can study potential amendments to reconcile the RSO with RPO procedures. Without commenting on, the ICO is required to comply with the limitations established under state law, including Government Code section 65868, which limits the duration of emergency ordinance (to 45 days from the date of adoption with the possibility of an extension of 10 months and 15 days and a possible further extension of one year).

Conclusion

In summary, HCD has determined that the ICO's narrowly tailored proposed prohibition on demolition permits for occupied residential dwelling units that are or were subject to any form of rent or price control within a small portion of the Valley Glen community meets the requirements of Government Code section 66300, subdivision (i). HCD hereby approves the adoption and enforcement of the ICO in a small portion of the Valley Glen community consistent with Government Code section 65858.

If you have any questions regarding the content of this letter or would like additional technical assistance, please contact Mackenzie Goldberg at mackenzie.goldberg@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Melinda Coy", with a long horizontal stroke extending to the right.

Melinda Coy
Housing Accountability Unit Chief

cc: Courtney Schoenwald, City Planner, courtney.schoenwald@lacity.org
Sarah Hounsell, Senior City Planner, sarah.hounsell@lacity.org