

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

DAY OF HEARING SUBMISSIONS



January 19, 2022

Submitted via email to: apcwestla@lacity.org

Re: DIR-2020-5351-CDP-SPP-1A (22 and 22 ½ East Paloma Avenue)

Dear West LA Area Planning Commissioners:

I am writing on behalf of People Organized for Westside Renewal (POWER) regarding case DIR-2020-5351-CDP-SPP-1A. Our position is that subdividing a five-unit RSO multifamily property constitutes a conversion under the Mello Act, and therefore requires a Mello Act review. Absent a Mello Act review and the appropriate conditions to protect existing affordable housing, the project as proposed could contribute to the loss of affordable housing within the Coastal Zone. A future project could be proposed where the preservation of existing affordable housing could be subject to a feasibility review. With the existing five-unit project there would be no feasibility review.

Additionally, the division could open the door to activity not governed by the planning process which may result in the additional loss of affordable housing within the Coastal Zone, for instance by doubling the amount of evictions for landlord occupancy permitted under the LA Rent Stabilization Ordinance (RSO).

Planning Staff asserts that the project does not constitute a “conversion.” We dispute this characterization. At least one of the new projects must generate a new APN, resulting in either a “new” project or a conversion of the existing project, either of which requires a Mello Act review.

Planning Staff also claims that the project does not “trigger” a Mello Act review. This Commission has the power to require a Mello Act review as a condition of approval on this discretionary project. Furthermore, while the IAP articulates when a Mello Act review *must* take place, it does not restrict LAHD from conducting Mello Act reviews, and there is precedent for conducting a Mello Act review even when there is no permit on file (see attachment from 542-568 S. Venice Blvd.).

Finally, the staff objected to the costs of time and money required for a Mello Act review. We believe that the City’s agencies should prioritize protecting affordable housing, and also can rely on LAHD’s RSO rental registry, in place since 2016, to determine monthly housing costs for each of the RSO units on site, greatly expediting the Mello Review process.

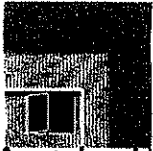
At a hearing on November 17, 2021, Planning Staff claimed that a Mello Act review was unnecessary at this time, in part because of the implementation of SB 330, and also that the units would remain covered by the Ellis Act post-conversion. The staff failed to mention that SB 330 sunsets, while the Mello Act does not. The Ellis Act is a red herring, appellants made no claim about the elimination of RSO nor Ellis Act protections, but we will point out that numerous other cases reviewed by this commission where existing affordable housing was lost due to “infeasibility” occurred at sites where the RSO and Ellis Act were also in place.

We hope this information will assist the Commission in making the decision that is most protective of affordable housing in the Coastal Zone.

Sincerely,

Bill Przylucki, Executive Director

Enc.



Los Angeles Housing Department

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Antonio R. Villaraigosa, Mayor

Mercedes Márquez, General Manager

Memorandum

Date: June 26, 2008
To: Susan Palmas, Los Angeles Planning Department
From: *CS* Cynthia Landis, Los Angeles Housing Department
Re: 542-568 South Venice Boulevard, Los Angeles, CA 90291

Declaration of presence of affordable units - REVISED
(Replaces Declaration of June 22, 2007)

Based upon the rent and tenant information for the previous three years submitted by the owner, and information submitted by tenants, it was determined that twenty-three (23) affordable units exist, which include Units 542, 544-1, 544-2, 544-3, 544-4, 546-1, 546-2, 548-2, 548-3, 548-4, 556, 558, 562-2, 562-3, 562-4, 564-1, 564-2, 566-1, 566-2, 566-3, 566-4, and 568, at:

542-568 South Venice Boulevard, Los Angeles, CA 90291

All existing tenants have had the opportunity to document their household income.

The project must provide fifteen (15) one-bedroom replacement affordable units and nine (9) two-bedroom replacement affordable units.

c: Los Angeles Housing Department File
Bryan Domyan, Owner Representative
Richard A. Rothschild, Western Center on Law and Poverty, Inc.