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August 21, 2025

VIA E-MAIL

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**Re: 1451 South Hi Point Street; Case Nos. TT-84566-CC-1A, ENV-2024-3793-CE
("Project")**

Dear Commissioners:

This letter is submitted on behalf of my client, Elaine Johnson of LA GLO, Inc., the Applicant and owner of the property at 1451 S. Hi Point Street. We write in support of the Appeal Recommendations Report for Case No. TT-84566-CC-1A, which recommends denying the appeal filed by Ilan Douek of 1459 S. Hi Point LLC and sustaining the Advisory Agency's approval of the Tentative Tract Map ("Project").

The Appeal Recommendations Report drafted by staff already refutes the Appellant's initial claims and recommends denial of the appeal. We also want to address the new arguments presented in the Appellant's letter dated August 18, 2025.

I. There is No Low-Income Housing to Replace

The Appellant's assertion that the Project fails to provide replacement low-income housing is without merit. The Appellant "*believes* that at least one or more of the existing units are occupied or have been occupied by low-income tenants in the last five years." This claim is based on speculation and is factually incorrect. None of the units have been occupied by low-income tenants within the last five years, so the requirements of the Housing Crisis Act of 2019 do not apply. Additionally, the property is not subject to the City's Rent Stabilization Ordinance.

II. The Project Will Comply with All Tenant Eviction Protections

The Appellant's argument that the project violates tenant eviction protections is also based on a false premise. The Appellant suggests that a condominium conversion "necessarily contemplates" evicting tenants. This is not the case here. My client does not intend to evict any tenants for the purpose of selling the units. The current owner plans to remain the landlord and units will only be sold if a tenant voluntarily vacates or chooses to purchase their unit. The owner will also consider favorable selling terms with existing tenants.

Furthermore, the Project's approval includes conditions to ensure compliance with city regulations related to condominium conversions, which provide comprehensive tenant protections. These conditions include:

- Providing tenants with at least a 180-day written notice of the intent to convert prior to tenancy termination.
- Granting each tenant an exclusive right to purchase their unit for at least 90 days on terms that are the same as or more favorable than those offered to the general public.
- Requiring the subdivider to pay a Rental Housing Production Fee for each unit to the Los Angeles Housing Department.
- Requiring relocation assistance consistent with the Los Angeles Municipal Code (LAMC) Sections 12.95.2G and 47.06.
- Submitting proof to the Advisory Agency that tenants were given written notification of the condominium conversion within 30 days of the final map recordation.

These conditions can be found at CC-2 to CC-5 of the Letter of Determination issued May 23, 2025.

III. The Project Complies with CEQA

The Appellant's claim that the project does not comply with the California Environmental Quality Act (CEQA) is incorrect. The Advisory Agency correctly determined that the project is exempt under CEQA Guidelines Article 19, Section 15301, Class 1 (Existing Facilities).

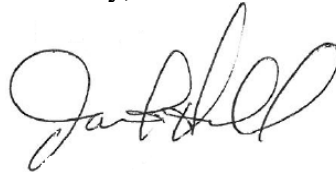
The key consideration for a Class 1 exemption is whether the project involves "negligible or no expansion of existing or former use." The Project at 1451 S. Hi Point Street is an eight-unit condominium conversion of an existing eight-unit apartment building. No demolition, additions, or new construction is proposed. Since there are no physical changes to the building and no expansion of use, the project fits squarely within this exemption.

There is ample evidence in the administrative record supporting the City's determination, and the Appellant has failed to provide any substantial evidence to the contrary. We respectfully request that the Commission deny the appeal and uphold the Advisory Agency's decision.

IV. Conclusion

The appeal is without merit and should be denied. Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall

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DAY OF HEARING SUBMISSIONS