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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



Los Angeles Central Area Planning Commission
200 N Spring St, Room 272
Los Angeles, CA 90012

May 12, 2026

RE: Council Office Support of Appeal VTT-84762-SL-1A at 4061-4069½ Melrose Ave

Dear Commission President Lawrence and Honorable Central Area Planning Commission Members,

In April of 2025, our office was approached by a group of tenants living in the 10-unit Bungalow Court at 4061-4069½ Melrose Avenue in East Hollywood, who to this day, still face potential housing insecurity due to the proposed Small Lot Subdivision of their homes, which they have appealed to your commission (Case: VTT-84762-SL-1A). In this letter, I would like to express the Councilmember's concerns and opposition to the proposed subdivision of this Bungalow Court and our office's support of the tenants' appeal.

While our office is generally supportive of new housing in our district, the case in front of you does not increase our housing stock, nor provides a public good, such as new affordable units. Instead, this proposed subdivision would eliminate protections guaranteed under the Rent Stabilization Ordinance (RSO) for eight units of naturally occurring affordable housing upon approval of the Final Tract Map.

Our office's primary concern is the applicability and proper implementation of SB8, the Housing Crisis Act (HCA), and our locally adopted Resident Protections Ordinance (RPO) in order to best protect the existing onsite tenants. As you are aware, the HCA has several key elements: to ensure "no net loss" of housing, to prevent and mitigate impacts to protected units or protected tenants, and lastly, provided both of those are solved, to mandate the approval of new housing projects. In order to ensure there is no net loss of units, housing projects are compelled to provide at least as many units as existed on the site in the past five years under the HCA.

In this case, the proposed subdivision does not add new housing units, nor do they physically remove units. Therefore, the City Planning Department has interpreted this project as outside the Housing Crisis Act. If we are going with the Department's interpretation that the project is a "housing neutral project" and the HCA does not apply, then our office strongly recommends denial of this project for the following reasons.

First is non-compliance with the following Citywide Housing Priority within the 2021-2029 Adopted Housing Element of our City's General Plan of: *"Preventing Displacement: Protect Angelenos—especially persons of color and the disabled—from indirect and direct displacement, and ensure stability of existing vulnerable communities."*

Secondly, approval of the subdivision runs contrary to the following objective in the Housing Element: *"Objective 2.1: Strengthen renter protections, prevent displacement and increase the stock of affordable housing."*

Policies 2.1.1: Incentivize and/or require the preservation and replacement of affordable housing, so demolitions and conversions do not result in the net loss of the City's stock of accessible, safe, healthy and affordable housing" (noting that in this context lower case affordable housing is inclusive of all naturally occurring affordable housing, including RSO).

The subdivision of this lot's primary outcome would be to change a multifamily, rent-controlled property into individually owned single family homes. Approval of this project is in direct opposition to the above stated goals of our Housing Element, and it is imperative that you grant this appeal.

However, we would also like to put forward our belief that this project should be considered under the rules of the Housing Crisis Act. No net loss, as currently interpreted by the City, is taken to refer to the physical loss or demolition of units. However, this subdivision will convert protected units that may also be occupied by protected tenants by immediately removing the protections of rent stabilization. These units are effectively being demolished. Even if lines on the map create the demolition and not a bulldozer, it does not change the outcome of a net loss of these protected units. Other state housing laws include a lookback provision for occupancy of rent controlled units that would indicate that the State clearly does not mean to allow for the loss of protected units in the provision of other housing.

If this project is a Housing Crisis Act project, cities are compelled to deny housing projects which are not in compliance with the provisions of SB8. Under SB8, an applicant "must also replace all existing Protected Units" and afford certain rights to all tenants in such units. The definition of Protected Units includes any unit that is "subject to any form of rent or price control within the past 5 years", with a specific focus on units occupied by lower income tenants. While the project includes a No Net Loss Declaration, claiming that no units were being removed, we still find that the loss of the protected status of eight units, without the proper replacement, is not in compliance with SB8. Therefore, as approval of this project does not properly follow SB8, the City is compelled to deny it.

The Determination Letter dated February 26, 2026 does include specific information about tenant relocation and notification in Conditions 32,33, and 34. In the case this project is approved, the applicant will be bound to abide by all provisions of the Ellis Act and to provide relocation assistance in a manner consistent with rental subsidies for tenants evicted for condominium conversions. We appreciate Planning's inclusion of this, which guarantees some relocation assistance and a brief right to remain, but RSO status is about more than just the applicability of the Ellis Act in the case of eviction. For these tenants, the RSO means a limit on allowable rent increases and the right to remain and to relocation assistance under the both Ellis Act and Resident Protections Ordinance.

Although these units are not being demolished, these tenants are losing their RSO status and will likely be facing eviction when their units are purchased as single-family homes. Our office is seeking clarity that, should this Commission approve this project, these tenants will receive the protections they are guaranteed under our local and state law. The tenants here and in other RSO properties in Los Angeles can attest to the security that being a tenant in an RSO unit provides. Our office demands that if this project is approved, language cementing all protections is included.

Between this case, a similar case on Scott Avenue in Echo Park, and a proposed TOC project on Sunset in East Hollywood, this is the third time in the last year our office has had to step in to demand that the City follow its own laws in order to protect 24 households facing eviction. The Councilmember is prepared to use the legislative tools at his disposal to ensure that these tenants' protections are fully upheld by the City.

In summary, this proposed project is neither in compliance with the City or the State's objectives and requirements to prevent the loss of protected housing and the displacement of protected tenants. As such, it is imperative that the tenants' appeal be granted and the project denied. The subdivision of this community doesn't just equate to new lines being drawn on a map; it means the displacement of vulnerable tenants and the disappearance of eight units of protected housing that the city so desperately needs, without providing the tenants the rights that they are entitled to under State and local law.

Sincerely,
Ted Walker, Planning Deputy
Council District 13, Councilmember Soto-Martinez
City Hall, 200 N Main St, Room 480, Los Angeles, CA 90012

On Sat, May 9, 2026 at 8:00 PM Veronica Flamenco <veronica.pulido94@gmail.com> wrote:

Dear Yamillet Brizuela and the Central Area Planning Commission,

I am writing to formally submit my opposition to Case Number VTT-84762-SL-1A, which is scheduled for the hearing on Tuesday, May 12, 2026.

My family has lived in this RSO-protected building at [4065 1/2 Melrose Ave](#) for 31 years. This project would result in the direct displacement of my mother and my sister, who is currently caring for a newborn and is unemployed. Furthermore, my mother is currently suffering from a workplace injury, making the threat of losing her home even more life-altering and dangerous.

I am asking the Commission to uphold the appeal for the following reasons:

- **Tenant Displacement & Hardship:** This project destroys naturally occurring affordable housing and displaces a vulnerable, long-term family that has been part of the Hollywood community for over three decades.
- **SB 330 Compliance:** We have serious concerns regarding whether the developer has fully complied with the Housing Crisis Act (SB 330), specifically regarding the "Right to Return" and the mandatory replacement of RSO units.
- **Inadequate CEQA Review:** The environmental and social impacts of displacing long-term, injured, and vulnerable residents have not been properly mitigated in the current project plan.

Please include this letter in the official public case file. We urge the Commission to put the lives of long-term residents above developer profits and deny this project as currently proposed.

Sincerely,

Veronica Flamenco