

## Communication from Public

**Name:** Carlos Gonzalez

**Date Submitted:** 02/14/2025 05:07 PM

**Council File No:** 24-1225

**Comments for Public Posting:** Dear Housing and Homelessness Committee, My name is Carlos Gonzalez, and I am a tenant in council district 9 speaking on Agenda Item #1. Please support the ordinance to end renovictions with amendments to extend the expiration date of the ordinance and apply it to tenants with pending eviction cases. Hundreds of families have been displaced due to renovation work. This is a really urgent problem that the City Council already unanimously voted to put an end to. But it took so long for the temporary ordinance to be drafted that it no longer gives Council enough time to develop a permanent solution. We need to extend the amount of time the temporary ban is in place to make sure its expiration does not leave tenants vulnerable again. Additionally, the current draft of the ordinance does not apply to tenants with pending eviction cases. There are seniors and families in our community who are currently fighting renovictions in court. It is crucial that we amend the ordinance to protect them too. There is no reason anyone should lose their home due to renovation work, especially when their landlord is doing it with the purpose of flipping the unit and renting it out for more money. Please vote yes on Agenda Item #1 with amendments. If the interim control ordinance is not passed immediately and with amendments that protect tenants with pending eviction cases, landlords will rush to serve eviction notices.

## Communication from Public

**Name:**

**Date Submitted:** 02/14/2025 05:43 PM

**Council File No:** 24-1225

**Comments for Public Posting:** Dear Housing and Homelessness Committee, My name is Angela, and I am a resident of Council District 14, writing on Agenda Item #1. Please support the ordinance to end renovictions with amendments to extend the expiration date of the ordinance and apply it to tenants with pending eviction cases. Hundreds of families have been displaced due to renovation work. This is a really urgent problem that the City Council already unanimously voted to put an end to. But it took so long for the temporary ordinance to be drafted that it no longer gives Council enough time to develop a permanent solution. We need to extend the amount of time the temporary ban is in place to make sure its expiration does not leave tenants vulnerable again. Additionally, the current draft of the ordinance does not apply to tenants with pending eviction cases. There are seniors and families in our community who are currently fighting renovictions in court. It is crucial that we amend the ordinance to protect them too. There is no reason anyone should lose their home due to renovation work, especially when their landlord is doing it with the purpose of flipping the unit and renting it out for more money. Please vote yes on Agenda Item #1 with amendments.

## Communication from Public

**Name:** Los Angeles for Resilient and Healthy Homes Coalition  
**Date Submitted:** 02/14/2025 06:15 PM  
**Council File No:** 24-1225  
**Comments for Public Posting:** Please find a letter from the Los Angeles for Resilient and Healthy Homes Coalition attached.



February 14, 2025

Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

**Re: Substantial Remodel Eviction Interim Control Ordinance (CF 24-1225)**

Dear Members of the Housing and Homelessness Committee,

Members of the Los Angeles for Resilient and Healthy Homes (LARHH) coalition submit this letter to urge amendments to the draft Interim Control Ordinance (ICO) on substantial remodel evictions. As written, the draft ICO is set to expire imminently and excludes a highly vulnerable population of tenants—those with pending eviction cases.

**We urge the Council to introduce amendments to the ICO to:**

- 1. Extend the ICO to be in effect until December 1, 2025.**
- 2. Extend the ICO to apply in eviction cases where there is no current judgement.**

Substantial remodel evictions are evictions for renovation work that are routinely used by landlords in bad faith to circumvent rent caps. Data obtained from the Los Angeles Housing

Department (LAHD) demonstrates most substantial remodel eviction cases occur shortly after purchase by a new owner, indicating that evicting long-term tenants and flipping units is part of their business plan. In a Youtube webinar titled [“Renovate to Beat Rent Control,”](#) landlord attorney Dennis Block blatantly encourages landlords to exploit the loophole in this way. Many other jurisdictions in the region—including Culver City, Maywood, South Pasadena, Inglewood and Los Angeles County—have removed renovation work as a cause for eviction.

On October 29, 2024, Council unanimously voted in favor of an ICO to temporarily prohibit substantial remodel evictions during the development of a permanent solution. The purpose of the ICO was to immediately stem the tide of substantial remodel evictions. As a testament to the urgency of the situation, Council voted for the ICO to include an urgency clause which would enable it to go into effect immediately upon its adoption.

However, the drafting of the ICO took nearly four months to complete, undermining the urgency of the directive and risking expiration before a permanent ordinance goes into effect. Currently, the ICO is set to expire on June 1, 2025. This was a reasonable sunset date when the ICO was first requested in October 2024, but now does not allow Council, the LAHD, and the City Attorney enough time to create and enact a permanent ordinance.

Additionally, the ICO contains an exemption permitting substantial remodel evictions where the landlord has secured permits and complied with notice requirements to the tenant and the Los Angeles Housing Department. The California Supreme Court specifically allows legislative amendments to apply to pending eviction cases; there is no legal justification to include the exemption. It puts the very tenants the ICO was intended to protect—including seniors and families in our communities—at risk.

We urge the Council to introduce amendments to the ICO to ensure that it protects tenants from renovictions as intended.

Sincerely,

The Los Angeles for Resilient and Healthy Homes Coalition

## Communication from Public

**Name:** Keep LA Housed Coalition  
**Date Submitted:** 02/14/2025 11:42 AM  
**Council File No:** 24-1225  
**Comments for Public Posting:** Please see the attached letter on behalf of the Keep LA Housed Coalition



February 13, 2025

Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

**Re: Substantial Remodel Eviction Interim Control Ordinance (CF 24-1225)**

Dear Councilmembers,

The Keep LA Housed (“KLAH”) coalition submits this letter to provide technical assistance and public comment regarding the draft Interim Control Ordinance (the “ICO”) on substantial remodel evictions posted to Council File No. 24-1225 on February 7, 2025.

The City Council (“Council”) voted for an ICO to temporarily and immediately prohibit all substantial remodel evictions, but the ordinance draft by the City Attorney contains an exemption for substantial remodel evictions where the landlord has secured permits and complied with statutory notice requirements. **This exemption contradicts both the spirit and the letter of the Council directive.** Further, the sunset date of June 1, 2025 - while reasonable when the ICO was first requested in October 2024 - now offers too little time for Council to enact a permanent ordinance. As such, KLAH requests the following changes be made to section 2 of the draft ICO:

Notwithstanding the foregoing, substantially remodeling residential real property shall not be permitted as a ground for eviction from the effective date of this ordinance through **December 31, 2025** ~~June 1, 2025~~ (unless earlier repealed or superseded by ordinance) ~~except where the landlord has secured all necessary permits, filed with the Department a Declaration of Intent to Withdraw, Demolish, or Substantially remodel under the Just Cause For Eviction Ordinance, and fully complied with all notice requirements set forth in this subsection prior to the effective date of this ordinance.~~

**Substantial remodel evictions have been a tool for rampant abuse and bad faith evictions.** Landlords use this provision pretextually to subvert rent caps. For example, in videos posted to Youtube, landlord attorney Dennis Block explicitly describes the substantial remodel loophole as a way to “beat rent control” and advises landlords to use it to remove tenants paying below market-rate rents who they otherwise would have no basis to evict.<sup>1</sup> Our analysis of the City’s eviction notice data on substantial remodel notices, cross-referenced with real estate records, show that most substantial remodel notices were served shortly after transfer of property ownership. Based on this data and our experience working with impacted tenants, investors use the substantial remodel provision to flip units - or entire buildings.

---

<sup>1</sup> <https://www.youtube.com/watch?v=xN82HIzJWS0>.

### **Landlords Have No Vested Rights to Evict on Past Notices or Permits**

California law is clear: landlords have *no* vested rights to proceed with an eviction that becomes illegal while the case is pending. **As a matter of law, no vested rights accrue in the service of an eviction notice.** If a law changes after a landlord takes initial steps to evict a tenant, the landlord nonetheless has no right to proceed with an eviction that has become illegal. In *McHugh v. Protective Life Ins. Co.* (2021) 12 Cal. 5th 213, the California Supreme Court specifically clarified that legislative amendments apply to pending litigation, especially when a business receives reasonable notice of a possible statutory change. In fact, the *McHugh* court held that in certain highly regulated industries - such as the residential rental market - regulatory and legislative changes can *always* be “reasonably anticipated.”<sup>2</sup> Here, landlords have had notice of this change in the ordinance since as late as October 29, 2024, if not earlier.

**Further, this legal principle has already been repeatedly upheld in Los Angeles Superior Courts.** Unlawful detainer courtrooms across the County have been applying this principle to eviction notices served before a State law - Senate Bill 567 (“SB 567”) - updated the language requirements for those notices. SB 567 passed on September 30, 2023, but was not effective until April 1, 2024. This law required eviction notices based on substantial renovation to include language informing tenants of rights that the new law established. In line with the principles stated above, several Superior Court judges have dismissed pending eviction cases when a notice served **before** April 1, 2024 did not comply with the new law. These judges considered that, like here, landlords had several months’ notice of the upcoming statutory changes.

### **The Draft ICO Contradicts Council’s Directive and Breaks from Past Legislative Practice**

The ICO was requested by Council as an interim measure to immediately stop all substantial remodel evictions, pending the adoption of a permanent ordinance. On October 29, 2024, the Council voted unanimously for an ICO after hearing extensive comment about how the provision was currently being abused, and hearing directly from tenants who were at risk of being evicted. **The purpose of the ICO was to immediately halt all evictions on this basis.** The directive was for “the City Attorney to draft and transmit an interim control ordinance in order to temporarily remove the eviction process from LAMC Section 165.03 I.2 until June 1, 2025, or when a permanent ordinance is enacted, whichever comes first, and that the ICO include an Urgency Clause, making it effective upon publication.” By demanding an urgency clause, Council clearly contemplated the same immediate effect.

However, when the City Attorney transmitted a draft of the ICO on February 7, 2025, it included a provision exempting substantial remodel evictions “where the landlord has secured all necessary permits” and served the necessary notices on tenants and the LAHD. The City Attorney’s attached report stated that this addition was requested during the drafting process by LAHD. **Notably, the Council directive for the ICO did not request participation from LAHD in the drafting process, and numerous public comments directed to Council explicitly requested an ICO that would apply to active substantial remodel evictions.** The draft ICO’s proposed exception for current substantial remodel evictions would *permit* the very evictions that the ICO was intended to prevent.

---

<sup>2</sup> *McHugh* at 337.



As a policy matter, the unjustness of a tenant losing their home with no legal basis outweighs a landlord's right to pursue a particular type of eviction — especially when the Council has eliminated that basis due to its propensity for abuse. Further, the City has previously enacted landlord-tenant regulations that apply to pending eviction cases.<sup>3</sup>

### **Conclusion**

**There is no legal or policy basis for the exemption in the draft ICO.** It fails to comply with Council's directive and is not required by local or State law. There is no justification for this atypical departure from the City's past legislative practice.

Finally, given the late hour of the ICO's transmission, the June 2025 sunset date is no longer feasible. The draft ICO should be amended to sunset on December 31, 2025, in order for Council to have time to enact a permanent ordinance.

Sincerely,

Keep LA Housed

---

<sup>3</sup> See generally Los Angeles Municipal Code ("LAMC") sec. 165.1, 151.20(B)