

Communication from Public

Name: Chelsea Kirk

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Council File No: 24-1225

Comments for Public Posting: Dear members of the City Council, Please see the attached letter from the Los Angeles for Resilient and Healthy Homes Coalition in support of Option #1 in LAHD's report back on how best to close the substantial remodel loophole in the JCO.



May 27, 2025
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

Subject: Ending Substantial Remodel Evictions, LAHD Report Back [Council File 24-1225]

Dear Councilmember Raman,

On behalf of the undersigned organizations in the Los Angeles for Resilient and Healthy Homes Coalition (LARHH), we are writing in strong support of **Option #1** outlined in the Los Angeles Housing Department's Council Transmittal regarding substantial remodel evictions.

We strongly urge the City Council to adopt Option #1 over Options #2 and #3 for the following reasons:

1. Option #1 is the only policy that truly prevents displacement.

Unlike Options #2 and #3, Option #1 would fully eliminate “substantial remodel” as grounds for eviction—closing a loophole that landlords routinely exploit to remove long-standing tenants and dramatically raise rents. While LAHD’s report focuses on addressing “bad-faith” remodels, the deeper issue is that *any* eviction for remodeling—fraudulent or not—enables landlords to evict tenants at no fault and reset rents above the caps set by California’s Tenant Protection Act. This undermines the City’s goals of stability and affordability.

2. The need to upgrade buildings must not become a new displacement crisis.

Major changes are coming to make California’s housing stock healthier, safer, and more climate-resilient. Los Angeles is preparing to adopt a Building Energy Performance Standard that will require building electrification and energy upgrades. Seismic retrofits and extreme heat resilience measures are also on the horizon. These critical improvements must not be used as a pretext to evict tenants. If we fail to act, well-intentioned climate and safety mandates could trigger a wave of displacement. Option #1 is the only path that protects tenants during this transition.

3. We have seen how the substantial remodel loophole is weaponized.

From Council District 13 to Districts 11 and 12, tenants across Los Angeles have faced repeated eviction attempts following superficial upgrades—often just months after a building changes hands. Our analysis of LAHD data confirms that many of these eviction notices are served

shortly after a property is acquired, typically by a corporate landlord. This pattern suggests that eviction is not incidental but a core feature of a profit-driven investment strategy.

Landlord attorneys openly promote this tactic as a way to sidestep rent control protections. In a September 2024 YouTube video, eviction attorney Dennis Block describes the “substantial remodel” loophole as a tool to “beat rent control” and encourages landlords to use it to remove tenants paying below-market rents—tenants they would otherwise have no legal basis to evict.¹

At the Apartment Owners Association’s “Big Million Dollar Trade Show & Landlording Conference” on April 16, 2025, eviction lawyer Bijan Shakibkoo of SNS Law Group proudly admitted that “substantial remodel” evictions are his preferred method for removing tenants and he noted that the City had caught on to this loophole.

4. Option #1 upholds the original intent of Council’s motion.

The Council directed LAHD to find a way for non-RSO tenants to maintain tenancy during renovation work—mirroring the Tenant Habitability Program (THP) for RSO units. Only Option #1 fulfills that mandate. Option #2 offers no protections for tenants. Option #3 gestures toward the right to reoccupy—but without rent protections, it’s a hollow promise. Returning at triple the rent is not an option for most tenants.

5. Option #1 is the most efficient and cost-effective approach.

Unlike Options #2 and #3, Option #1 does not require the City to set up a new monitoring system or allocate additional funds—particularly critical given the City’s current budget crisis. It is a straightforward, enforceable solution that avoids confusion for landlords, tenants, and LAHD alike.

To conclude, we urge the Council to adopt Option #1 to ensure that essential housing upgrades do not come at the cost of displacing the very people who already call these buildings home. We also strongly request that this item be finalized and scheduled for a Council vote no later than July 30 to prevent more renovictions. It took the City Attorney nearly four months to draft the ICO, and LAHD has taken even longer to release this report back. With the ICO set to expire on August 1—and City Council in recess from July 2 through July 29—we risk a dangerous lapse in protections before a permanent ordinance can be adopted.

Landlords are already preparing to exploit that gap. On May 23, Dennis Block posted on X: “For properties subject to the Just Cause Ordinance for the City of Los Angeles, you will again be able [to] do evictions for substantial renovation... effective as of August 1, 2025.”² This public announcement signals to landlords that the City may not be serious about closing this loophole.

To prevent a disruption in tenant protections, we urge the Council to also adopt LAHD’s recommendation to extend the ICO until a permanent policy is enacted in January 2026.

¹ Video link: <https://www.youtube.com/watch?v=xN82HlzJWS0>

² <https://x.com/DennisBlock/status/1925957600656441774>

Thank you for your leadership.

Sincerely,

Los Angeles for Resilient and Healthy Homes