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**SUBJECT:** Carlton Way Appeal - Substantial Evidence, COUNCIL FILE NO: 25-0811

**Email Body:**

**COUNCIL FILE NO:** 25-0811

**CASE NO:** CPC-2024-914-DB-SPPC-VHCA

**CEQA:** ENV-2024-915-CE

**Plan Area:** Hollywood

**Council District:** 13 - Soto-Martinez

**Project Site:** 5416 - 5418, 5420, 5424-5428 and 5430 West Carlton Way Los Angeles, CA 90027

Honorable Chair Blumenfield and members of the PLUM Committee,

I urge you to support the Carlton Serrano Tenants Association Appeal and reject this proposed development, which would demolish seven rent-controlled buildings, displace nearly fifty vulnerable tenants, and would result in a net loss of naturally occurring low-income RSO housing.

The project is noncompliant with SB8, “No Net Loss,” the Resident Protection Ordinance (RPO), SNAP Subarea A, and CEQA. **Failing to comply with SB8 is grounds for project rejection and accordingly, this project must be denied.**

Replacing 25 existing RSO units with only 15 “Very Low Income” units (just 10.8% of the total) fails to justify the destruction of naturally occurring low-income RSO housing and promotes gentrification.

The use of off-menu waivers for a 176% height increase and 74% open space reduction prioritizes profit over community standards. The claim that the project complies with SNAP is flawed, especially in Subarea A. SNAP was specifically designed to protect quality of life and to prevent invasive noncompliant projects like this from occurring.

The removal of 17 trees, including two protected California Oaks, violates the Protected Tree Ordinance and necessitates a full Environmental Impact Report. Additionally, the site includes historic buildings with contextual value near the Edith Northman-designed Carlton Apartments, and their demolition would erode the area's historic fabric.

The developers, ROM Investments and their affiliates, have a documented history of tenant harassment, code violations, and unethical conduct, further underscoring why this project

should not proceed. **Tenant harassment, such as ROM Investments documented cases of refusing to conduct repairs violates the Housing Crisis Act (SB8), the Housing Crisis Act Replacement Unit Determination (RUD) and the Resident Protection Ordinance (RPO). As this development project is noncompliant, it must be denied.**

In over 1,000 pages of this Case, nowhere are 35,00 – 40,000 sf “unassigned” “co-working” (non-apartment) spaces explained. **State Density Bonus law requires proving that waivers enable affordable housing. The Off Menu Incentives and Waivers requested here are insupportable under Density Bonus law.**

**Failing to comply and failing to disclose the purpose of 35,000 – 40,000 sq feet of non-housing is grounds for project rejection; therefore, this project must be denied.** This is irrefutable evidence of the manipulation and abuse of the Density Bonus Law, including unnecessary luxury amenities, which have nothing to do with the "No Net Loss", per unit replacement of 25 RSO units.

The “unassigned, co-working” spaces are not “necessary” and are entirely unrelated to low-income housing. They cannot be used to justify waiver requests. The Department of City Planning (DCP) omits these sections and fails to describe them in its Letter of Determination, (LOD). **This project must be denied.**

Replacing 25 existing RSO units with only 15 “Very Low Income” units fails to justify the destruction of 25 existing naturally-occurring low-income RSO units. We must preserve our existing affordable housing stock. Decision-makers must understand that we need to do both, preserve and produce.

This is not an apples to apples replacement of genuinely affordable RSO housing. There needs to be a clear and precise distinction between existing RSO housing and market rate luxury housing. Replacing 25 RSO units with only 15 low income units is in reality, not equivalent. **Therefore, this development is noncompliant with the Housing Crisis Act (SB8) and the Housing Crisis Act Replacement Unit Determination (RUD).**

Please side with the community, not bad actors, and support the appeal.

Sincerely,

**(Your name and city and zip code)**