What does SB 1123 SHRA stand for?

SB 1123 SHRA refers to:

- **SB 1123:** California Senate Bill 1123 (2024), authored by Senator Anna Caballero.
- **SHRA: Starter Home Revitalization Act of 2021.**

SB 1123 amended the SHRA, originally expanded by SB 684, to streamline approval of qualifying small-lot subdivisions and housing developments containing up to 10 residential units.

Importantly, SB 1123 expanded eligibility to certain vacant lots in single-family residential zones, with **ministerial approval rather than discretionary review or public hearings**.

SB 1123 took effect July 1, 2025.



Housing and Community Development+1

For your Venice land-use work, the City of Los Angeles issued an updated implementation memorandum on October 28, 2025:

L.A. City Planning — SB 684 / SB 1123 Implementation Memorandum

One important question for Venice is how the SHRA's ministerial approval provisions interact with the Coastal Act and Coastal Development Permit requirements.

What if they make the lot vacant by demolishing what is there, shortly before they apply for the SHRA? Has the legislature or the City addressed that issue? Are there any rules/restrictions in that regard?

Yes. Both the California Legislature and the City of Los Angeles have addressed this issue. However, there is an important distinction between demolishing a protected residential building and demolishing an ordinary, owner-occupied single-family home.

Under SB 1123, a property owner may potentially demolish an existing building and subsequently apply for streamlined subdivision approval under the Starter Home Revitalization Act (SHRA). **There is no universal waiting period following demolition.** But certain types of housing remain ineligible even after demolition, and Los Angeles specifically provides for reviewing prior demolition permits.

1. What California law says

California Government Code § 66499.41 establishes the eligibility requirements.

For single-family-zoned parcels, the law defines *vacant* as having no permanent structure, unless the structure is abandoned and uninhabitable.

However, the statute expressly excludes certain housing from that definition, including:

- Housing subject to rent or sales-price affordability restrictions.
- Housing subject to local rent or sales-price control.
- Housing occupied by tenants within the preceding five years, **including housing already demolished or vacated before the development application.**

This third restriction is particularly important because it prevents an owner from circumventing the tenant-occupancy protection simply by demolishing the building before applying.

California Law+1

2. Los Angeles specifically addresses previous demolition

The City's SHRA eligibility checklist contains a particularly relevant provision:

Demolition or any alteration permits issued since January 2023 may be reviewed to ensure a SHRA project is not the result of a prohibited demolition or alteration.

This is an important enforcement mechanism. It means the City can look beyond the property's condition on the application date and examine its demolition history.

The City's implementation guidance also states that SHRA projects cannot involve demolition or alteration of RSO housing, certain affordable housing, or housing occupied by tenants during the preceding five years.

ZIMAS+1

3. What if the demolished house was owner-occupied?

This is where the potential loophole exists.

Consider these examples:

Situation	Potential SHRA eligibility
Owner demolishes an ordinary single-family house occupied only by the owner	Potentially eligible
Owner demolishes a house rented to tenants two years earlier	Ineligible under five-year tenant protection
Owner demolishes an RSO-protected duplex	Ineligible under SHRA demolition protections
Owner demolishes a nonresidential building	Potentially eligible, subject to other requirements
Owner demolishes a house immediately before applying	Timing alone does not establish ineligibility

Los Angeles's October 28, 2025, implementation memorandum, pages 3–4, confirms that demolition of a single-family dwelling not subject to the protected-housing restrictions may be addressed through a **No Net Loss Declaration (CP-4069)**. The City may deny or revoke SHRA approval if that declaration contains incorrect information.



LA City Planning+1

Therefore, I did not find a categorical prohibition against demolishing an otherwise unprotected, owner-occupied single-family home shortly before applying for SHRA approval.

4. An additional issue: the City's stated intent to prevent unnecessary demolition

The City's October 28, 2025 memorandum contains an interesting statement in FAQ No. 1.

In discussing when an existing structure can qualify as abandoned and uninhabitable, the City refers to its desire to minimize vacant land and prevent unnecessary demolition when projects cannot be constructed.

However, **this is an expression of implementation intent, not an independent prohibition against demolishing an otherwise unprotected home.**



LA City Planning

5. What I would investigate for a Venice property

There are two separate questions that should not be conflated:

First, did the demolition violate SHRA's housing protections or the Housing Crisis Act's replacement requirements?

Second, even if the lot qualifies as vacant under SHRA, does the proposed development still require a Coastal Development Permit and compliance with applicable Coastal Act requirements?

The second question is especially important in Venice. SHRA's ministerial subdivision provisions should not automatically be assumed to eliminate independent Coastal Act requirements.

My conclusion: The Legislature expressly closed the loophole for housing occupied by tenants within the preceding five years, including housing demolished before application. But it appears to have left open the possibility of demolishing an unprotected owner-occupied home to create a vacant lot eligible for SHRA.

Sources:

- L.A. City Planning SHRA Implementation Memorandum — October 28, 2025
- City of Los Angeles SHRA Eligibility Requirements
- California Government Code § 66499.41

One question: Is the property you're concerned about in the Venice Coastal Zone, and was the demolished structure a single-family residence or a multifamily building? That distinction could substantially change the legal analysis.

It was a single family residence, not in the Coastal Zone

That narrows the issue considerably.

Since the property was a **single-family residence outside the Coastal Zone**, the Coastal Development Permit requirements do not apply.

The critical question is now whether the owner can demolish an existing single-family house, create a vacant lot, and then qualify for SB 1123's streamlined subdivision provisions.

The fact that the house was demolished shortly before the SHRA application does not, by itself, necessarily disqualify the property. The property's prior occupancy, rental history, and any applicable housing protections are much more important.

What I would focus on

For this property, I would investigate four things:

1. **Was the house rented at any point during the five years before the SHRA application?** Even one qualifying tenancy could make the site ineligible under Government Code § 66499.41(a)(2)(A)(ii)(III).



Justia Law

2. **When was the demolition permit issued, and when was demolition completed?** Compare those dates with the SHRA application date.
3. **Did the applicant submit a No Net Loss Declaration (CP-4069)?** Los Angeles specifically permits this procedure for certain demolished single-family dwellings, but the declaration must be accurate.



LA City Planning

4. **Were the Housing Crisis Act and Resident Protections Ordinance requirements satisfied?** These can apply even when the demolition occurred before the SHRA application.



LAHD+1

The City's official SHRA implementation webpage confirms that single-family-zoned properties must be vacant when the application is submitted, subject to the statutory exclusions. It does not establish a minimum period the lot must have remained vacant.

I have two questions that would help determine whether there's a legal basis to challenge the SHRA eligibility:

1. Was the demolished house **owner-occupied, tenant-occupied, or vacant** before demolition?
2. Approximately **when was it demolished**—in 2024, 2025, or 2026?

With those two facts, we can narrow down whether the applicant legitimately qualifies or whether the City should investigate the property's prior residential use.

how do we find out this information? the applicant isn't going to volunteer it

You don't need to rely on the applicant volunteering that information. **The City of Los Angeles has records that can help establish when the house was demolished, whether it was legally rented, and what the applicant represented when claiming eligibility under SB 1123.**

I would approach this as a records investigation, beginning with the City's own files. Importantly, I would also ask Planning to explain **what evidence it relied upon to determine that the property qualified as a vacant lot under SHRA.**

1. Start with the demolition and SHRA application records

The first step is to establish a timeline:

- When was the demolition permit applied for and issued?
- When did the demolition actually occur?
- When was the SHRA application submitted?
- What did the applicant disclose about the former residence, its occupancy, and its demolition?
- Did the City independently verify those representations?

The demolition permit may also identify the owner, contractor, scope of work, and any required clearances.

2. Where to find the records

LADBS PRISM — Building Permit Records

Search by property address or Assessor's Parcel Number. Look for demolition permits, inspection records, and the permit's final status. This is the City's current permit and records search system.

Prism

ZIMAS — Property and Housing Information

Under the Housing tab, check **Housing Use Within Prior 5 Years**, Rent Stabilization Ordinance status, and Ellis Act information. The City's own No Net Loss Declaration directs applicants to this five-year housing-use field.

City Planning Department+1

City Planning — SHRA Project Information

Request the complete SHRA case file, including the signed No Net Loss Declaration (CP-4069), eligibility checklist, application materials, and staff review. The City expressly permits use of CP-4069 for qualifying SHRA projects involving a demolished single-family dwelling.

Los Angeles City Planning

Los Angeles Housing Department (LAHD)

Email: LAHD-Landuse@lacity.org

Ask whether LAHD reviewed the site's prior housing use, tenant occupancy, replacement-unit requirements, or any Resident Protections Ordinance obligations.

City Planning Department

3. The most important document: CP-4069

I checked the City's actual No Net Loss Declaration (CP-4069), revised October 22, 2025.

Page 2 specifically identifies SHRA projects where only one single-family dwelling has been or will be demolished and was not occupied by tenants within the preceding five years.

That makes the applicant's signed declaration especially important. It is not simply a matter of whether the lot appears vacant today. **The City has a formal procedure for documenting compliance with the prior-occupancy restrictions.**



City Planning Department

However, a declaration is evidence of what the owner certified, not independent proof that the certification is accurate.

4. Submit a targeted California Public Records Act request

I would send this to City Planning and copy LAHD. You can request records without having to establish that a violation has already occurred.

Recipients

Dear City Planning:

Pursuant to the California Public Records Act, I request copies of the following records concerning the property at [PROPERTY ADDRESS], APN [NUMBER], and its proposed development under SB 1123 and the Starter Home Revitalization Act (SHRA):

1. The complete SHRA application and supporting materials, including all eligibility checklists, signed declarations, and any No Net Loss Declaration (CP-4069).
2. All records concerning the demolition of the former single-family residence, including demolition permit applications, issued permits, inspection records, and any demolition-related clearances or approvals in the City's possession.
3. All records submitted by the applicant or obtained by the City concerning the former residence's occupancy, rental history, vacancy, or use during the five years preceding the SHRA application.
4. Any Replacement Unit Determination, LAHD correspondence, Housing Crisis Act or Resident Protections Ordinance compliance review, or other records addressing the former residential use.
5. All staff analyses, internal communications, correspondence with the applicant, and determinations concerning whether the property qualifies as a vacant parcel under Government Code Section 66499.41, including consideration of the prior demolition.

6. Any records showing how City staff verified the accuracy of the applicant's representations regarding the prior occupancy and demolition of the residence.

Please provide the records electronically. If any responsive records are withheld, please identify the applicable legal exemption and provide all reasonably segregable nonexempt portions.

Separately, please identify the City department and staff member responsible for determining SHRA eligibility for this application.

Thank you for your assistance.

Robin Rudisill

5. What if the City has no evidence of whether the house was rented?

That is a possibility. A single-family house may have been rented without appearing in the City's RSO database.

Additional evidence might include historical real estate rental listings, archived property advertisements, utility-account records where legally accessible, and statements from neighbors with firsthand knowledge. Private tenant information may be confidential and unavailable through a public records request.

If the City relied solely on the owner's declaration, I would ask Planning whether any independent verification was performed and whether contradictory evidence would trigger reconsideration of the eligibility determination.

My recommendation: Obtain the signed CP-4069 and the demolition permit first. Those two documents should tell us what the applicant represented and establish much of the timeline.

What is the property's street address? If you give me the address, I can help investigate its permit history, Planning case, and publicly available records to see what evidence exists of its prior residential use.