

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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July 30, 2025

Arminé Chaparyan, Director of Community Development  
City of Santa Monica  
1685 Main Street  
Santa Monica, CA 9040

Dear Arminé Chaparyan:

**RE: City of Santa Monica, 122 Strand Street - Demolition of Housing Units –  
Letter of Technical Assistance**

The California Department of Housing and Community Development (HCD) received an inquiry regarding the proposed housing development project at 122 Strand Street (Project). The purpose of this letter is for HCD to provide technical assistance to the City of Santa Monica (City) regarding the provisions of the Housing Crisis Act (HCA) regarding demolition of housing units.<sup>1</sup>

**Background**

The Project applicant proposes building eight housing units. The site is currently vacant but previously contained four housing units.

The HCA states that the City “shall not approve a development project ...that is located on a site where protected units were demolished in the previous five years” unless specific requirements are satisfied.<sup>2</sup>

On November 7, 2019, the City issued a demolition permit to a prior owner to demolish four units on that property. The contractor’s records indicate that the demolition occurred in November 2019. The City issued a sidewalk/street parking permit for dumpsters and construction vehicle parking on November 12, 2019.

HCD notes that Google aerial views from August 30, 2019 and January 3, 2020 show that the four units were demolished between that timeframe. However, the final paperwork for the City to close out the demolition permit was not completed until December 2, 2022.

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<sup>1</sup> Gov. Code, §§ 66300.5 and 66300.6.

<sup>2</sup> Gov. Code, § 66300.6, subd. (b).

The Project applicant asked HCD the following question:

**Question: When is a unit considered “demolished” for the purposes of the HCA – when the unit is physically removed or when the demolition permit is closed?**

Answer: A unit is considered “demolished” for the purposes of the HCA when it is physically removed from the site, not on the date the demolition permit is closed, subject to credible evidence of the date that the unit was physically demolished and removed from the site.

Local jurisdictions may require applicants to provide such credible evidence of the date of physical demolition, including but not limited to Google images, invoices from contractors, or similar types of evidence.

### **Conclusion**

HCD hopes this technical assistance is helpful. If you have any questions regarding the content of this letter or need additional technical assistance, please contact Stephanie Reyes at [Stephanie.Reyes@hcd.ca.gov](mailto:Stephanie.Reyes@hcd.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Zisser', with a stylized flourish extending to the right.

David Zisser  
Assistant Deputy Director  
Local Government Relations and Accountability

cc: Jing Yeo, Planning Manager  
Heidi von Tongeln, Chief Deputy City Attorney