

Communication from Public

Name: Heritage Properties

Date Submitted: 12/13/2024 10:21 AM

Council File No: 21-0934

Comments for Public Posting: The Council File reflects extensive changes to the Community Plan approved by PLUM which have not been analyzed in a Supplemental EIR or reviewed by the public, the City Planning Commission or openly by PLUM. The biggest surprise is a new CPIO Regional Center Linkage Fee. Whereas the CPIO has been presented continuously as the vehicle for granting a density bonus in the Regional Center in exchange for developers providing affordable housing, this suddenly changed- unannounced. Already the opposition to incentivizing demolition and re-development of sites such as Grauman's Chinese for housing was intense, when masses of adequate sites exist and all the housing Hollywood needs for 2040 and to satisfy RHNA is already built, under construction, under permit, or entitled. Suddenly a "Linkage Fee" section in the CPIO created AFTER the May 2023 PLUM hearing and apparently undisclosed and un-analyzed allows developers to buy massive increases in FAR on the sites of Hollywood's most important landmarks for NO housing. Suddenly without disclosure hotels, commercial buildings, etc can simply "pay to play" for an undisclosed amount of money-- the CPIO is careful to NOT even commit to the linkage fee by calling the fee schedule an "Example". Either this is all a misprint or a shocking insertion which effectively puts the entire Community Plan and its EIR and its City Attorney "approvals" on its ear. The incentivized housing in the CPIO and its attendant infrastructure needs were never analyzed by this Community Plan EIR-- a strange "vacancy excuse" was used. Now commercial, industrial, hotel, etc doubling of growth in already dense areas is being given a permission slip with no discussion or quantitative analysis. Whatever brakes were on this unsustainable growth "pay to play" were present in the redevelopment plan (which had milestones for checking infrastructure as Hollywood grew) are also being removed by this Community Plan Update. In the face of a genuine climate crisis and a genuine need to locate growth responsibly with minimized environmental damage, this latest stealth "incentive" is inexcusable.

- (iv) Address of the site;
- (v) Name and contact information for the owner or manager of the site; and
- (vi) Instructions to call 311 in the case of questions or complaints.

D. CPIO Additional Affordable Housing Linkage Fee Projects.

1. Requirements. A Project that meets all of the following requirements shall be eligible for the CPIO Bonus Incentives in Section II-4.D.2:

- (a) **Non-Residential Uses.** The Project is entirely comprised of Non-Residential Uses.
- (b) **CPIO Additional Affordable Housing Fee Payment.** Prior to the issuance of a building permit, the applicant shall pay a CPIO Additional Affordable Housing Fee in an amount calculated in Paragraph (c), below. Any fees paid under this Paragraph shall be placed in the trust fund created under Los Angeles Administrative Code Section 5.522 and may be used for any purpose authorized for monies in that trust fund.
- (c) **CPIO Additional Affordable Housing Fee Amount.** The CPIO Additional Affordable Housing Fee shall be calculated as the amount of additional floor area (in square feet) above the Base FAR in the Project devoted to the uses described in the CPIO Additional Affordable Housing Fee Schedule below, as determined by the Director, multiplied by the amount of the applicable fee for that use, as found in the most recent CPIO Additional Affordable Housing Fee schedule, as maintained by City Planning, at the time the building permit for the Project is issued. The CPIO Additional Affordable Housing Fee shall be consistent with the “high feasible fee” in the “High Market Zone” in the Los Angeles Affordable Housing Linkage Fee Nexus Study (attached as Appendix B), which may be adjusted by the latest price index as provided the Study, minus the current Linkage Fee for non-residential projects.

Example of the CPIO Additional Affordable Housing Fee Schedule
(from June 29, 2023)

Type of Use	Fee per Square-Foot
Office	\$33.00
Retail	\$27.00
Hotel	\$24.00
Industrial	\$17.00
Warehouse	\$24.00