



April 4th, 2023

Chairman Marqueece Harris-Dawson
Planning and Land Use Management Committee
200 N. Spring St
Los Angeles, CA 90012

Dear Chairman Harris-Dawson and Honorable Members of the Planning and Land Use Management Commission,

We urge you to adopt the Just Hollywood Plan. Hollywood's current development boom is a microcosm of the unsustainable environmental and economic trends in Los Angeles and across our country that mean riches for the few and crisis for the many. Since 2000, a luxury commercial development boom has doubled the number of hotel rooms in Hollywood with the number of hotel rooms set to double again if all projects in the pipeline are built. Commercial office space is also set to double. At the same time, Hollywood's working class is being pushed out of Hollywood. Driven out by increased rents, Hollywood's population dropped by 12,500 between 2000-2010.¹ In the face of the development boom, the Latino population dropped by 17 percent between 2000-2010, believed to be the largest mass departure from an LA neighborhood in decades.² Unfortunately, as passed by City Planning Commission, the Hollywood Plan does not meet the challenge of the moment. The plan is still a giveaway to commercial developers, allowing more luxury commercial development at the expense of the affordable housing desperately needed, doing little to address displacement.

On the contrary, our Just Hollywood Plan builds upon current housing incentives, ensures upzoning is focused on housing rather than luxury commercial development and will help stop the wave of displacement hitting Hollywood. We urge the following:

- 1. Community Control Over Hotel Development Via Hotel CUP.** A hotel CUP appealable to Council that will consider measures taken by the project sponsor to encourage transit use and local hiring to reduce traffic demand. The CUP should also require an analysis of the impact of the project on housing and small businesses. The CUP should explicitly ban the conversion of RSO

¹ See Community Plan Area Demographic Profile 2010-2014, https://planning.lacity.org/complan/CPA_DemographicProfile/2014_HOLLYWOOD.pdf; 1990 and 2000, <http://www.fixthecity.org/docs/HCPU/Decision.pdf>.

² <https://www.laweekly.com/news/hollywoods-urban-cleansing-2612554>.

apartments to hotels or at minimum require replacement with affordable units. Commenters therefore request that the existing CUP requirement in the Draft CPIO Section I-5-L³ be strengthened to address these hotel impacts as follows (~~redline for additions, red-strikethrough for deletions~~):

L. Conditional Use Permits for Hotels. Hotel and ~~transient occupancy residential structure projects that require the removal of residential units in the Regional Center subareas (RC1A, RC1B, RC2, RC3)~~ in the Hollywood CPIO plan area are required to obtain a Conditional Use Permit complying with the procedures in LAMC Section 12.24U~~W~~. ~~In addition to the findings required by LAMC Section 12.24U, the City Planning Commission shall consider and make express findings on each of the following:~~

- (a) ~~that there is sufficient market demand for the Hotel or transient occupancy residential structure project proposed~~
- (b) ~~that the hotel or transient occupancy residential structure project will not unduly and negatively impact demand in the City for affordable housing, public transit, child-care, and other social services, taking into consideration the impact of the part-time or seasonal nature of work at the hotel or transient occupancy residential structure project and of project employees' expected compensation.~~
- (c) ~~whether the applicant will take measures to employ residents of neighborhoods adjoining the hotel or transient occupancy residential structure project in order to minimize increased demand for regional transportation and to reduce demand for vehicle trips and vehicle miles traveled.~~
- (d) ~~whether the applicant will take measures to encourage hotel workers and guests to use public transportation, cycling and other non-automotive means of transportation.~~
- (e) ~~whether the hotel or transient occupancy residential structure project will displace or negatively impact small businesses in the immediate vicinity and whether the applicant will adopt any measures to increase demand for local goods and services.~~
- (f) ~~Whether the project will negatively affect the availability of affordable and rent-stabilized housing within the plan area. The project shall not demolish any building in which rent stabilized or restricted affordable housing existed in the last ten years or convert in whole or in part a building in which rent stabilized or restricted affordable housing existed in last ten years to a hotel or transient occupancy residential structure.~~

³ Exhibit F: CPIO Ordinance: Page 20 of pdf, page 13 of CPIO. < [https://planning.lacity.org/odocument/60c70e54-f774-4c79-be80-335024168e4b/Exhibit_F_-_Community_Plan_Implementation_Overlay_District_\(CPIO\)_\[Proposed_Ordinance\].pdf](https://planning.lacity.org/odocument/60c70e54-f774-4c79-be80-335024168e4b/Exhibit_F_-_Community_Plan_Implementation_Overlay_District_(CPIO)_[Proposed_Ordinance].pdf) >

2. No Developer Giveaways: Upzone for Housing with Affordability, Not Luxury Hotels and Commercial Uses.

- a. Do not increase base zoning rights, which allow commercial development to crowd out housing. Remove the increase in Base FAR from 2 to 3 or 4 in several plan subareas. By increasing the Base FAR, we undermine the incentive to construct housing through utilizing the density bonus (which allows an increase to 3 in exchange for an affordable housing set aside) or CPIO affordable housing programs, since applicants are effectively granted these rights for free. This violates Measure JJJ, which explicitly states that community plan changes cannot undermine California Government Code § 65915 (the density bonus program) or any other affordable housing incentive program. All projects seeking increased density should be required to utilize affordable housing incentive programs. The Plan must ensure that ***all*** upzoning and land use incentives are aligned with on-site affordable housing standards that meet or exceed the standards in Measure JJJ and the TOC Program.
- b. Hotels should not be allowed in projects using CPIO Affordable Housing, open space, or other bonuses.

3. Anti-Displacement Measures.

- a. In order to use CPIO, TOC, or density bonus incentives, a 1-1 to replacement requirement should be instituted.

Thank you very much for the opportunity to comment on the plan.

Regards,

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