

Communication from Public

Name: Bill Przylucki

Date Submitted: 06/03/2023 12:44 AM

Council File No: 18-1242

Comments for Public Posting: We respectfully urge you to sustain the appeal and reject the entitlements of a zone change and general plan amendment for the proposed project at 2005 James M. Wood Blvd. Over two and a half years ago we wrote to this committee encouraging you to reject this project, as it represents a pattern by the Department of City Planning of inconsistently interpreting and applying the municipal code and important land use programs and policies meant to increase the City's supply of affordable housing units. When the City approved the Venice Place project, the developer benefited from programs intended for residential development, yet at the same time the City never required them to comply with the inclusionary zoning requirements of the Mello Act, which apply to all residential developments within the Coastal Zone. Throughout that fight our members felt that every time we grasped the meaning of a "residential" project it would slip away. This project has many of those same characteristics. While the project appears to be benefiting from programs intended to encourage residential development, it has no corresponding Measure JJJ requirements to create affordable housing. When it comes to whether or not hotel projects are residential uses, the City of LA appears to have a consistently inconsistent position. Actually, though, the consistency is clear: The City will always privilege the needs of hotel developers above the City's desperate need to create and preserve affordable housing. Additionally, the project site was added to the 2021-2029 Housing Element's Inventory of Adequate Sites for Housing (it had not been in the previous Housing Element's inventory). We encourage this committee to reflect on the importance of the City remaining in compliance with the state's Housing Element laws when considering this appeal. The findings for the project acknowledge this and then hand wave this concern away, saying "the remaining sites identified in the Housing Element of the General Plan are adequate to meet the requirements of GC Section 65583.2 and to accommodate the jurisdiction's share of the regional housing need..." The finding goes on to explain how the City still must produce nearly 180,000 units of low and very-low income housing units, but it still has the remaining "capacity" to do so. We do not consider this finding adequate. With the Olympics approaching, we understand why private investors will be eager to

build hotels and other developments oriented toward short-term profit. However, the City is still struggling to explain how it will find the resources and the will to meet its RHNA requirements and make the long-term investment in the City's affordable housing stock. By its very nature, this problem will be addressed parcel-by-parcel, one project at a time. This project extends the pattern of privileging private investment to the point of warping the meaning of the municipal code, at the expense of figuring out where, when and how we will build the affordable housing our members have been fighting for for decades. We encourage and challenge this committee to do something that will disrupt this pattern. Figure out how we will meet the affordable housing needs of Angelenos first, before you continue to approve so many commercial, luxury residential and hotel projects that you reach the point where some future project's findings determine that we have only just enough "capacity" left to meet our RHNA requirements, and we've set ourselves the infeasible and impossible task of using every remaining site in the inventory for low income housing. For these reasons we request that you sustain the appeal and reject the entitlements for the proposed project at 2005 James M. Wood Blvd.



June 2, 2023

Submitted via LACouncilComment.com

Hon. Marqueece Harris-Dawson, Chair
Los Angeles City Council PLUM Committee
200 N. Spring St. Rm. 340
Los Angeles, CA 90012

Hon. Eunisses Hernandez, Councilmember 1st District
200 N. Spring St, Room 460
Los Angeles, CA 90012

Re: Item 12, CF 18-1242, 2005 West James M. Wood Blvd. — Sustain Appeal and Reject Entitlements

Dear Councilmember Harris-Dawson, PLUM Committee members and Councilmember Hernandez:

We respectfully urge you to sustain the appeal and reject the entitlements of a zone change and general plan amendment for the proposed project at 2005 James M. Wood Blvd.

Over two and a half years ago we wrote to this committee encouraging you to reject this project, as it represents a pattern by the Department of City Planning of inconsistently interpreting and applying the municipal code and important land use programs and policies meant to increase the City's supply of affordable housing units.

When the City approved the Venice Place project, the developer benefited from programs intended for residential development, yet at the same time the City never required them to comply with the inclusionary zoning requirements of the Mello Act, which apply to all residential developments within the Coastal Zone. Throughout that fight our members felt that every time we grasped the meaning of a "residential" project it would slip away.

This project has many of those same characteristics. While the project appears to be benefiting from programs intended to encourage residential development, it has no corresponding Measure JJJ requirements to create affordable housing.

When it comes to whether or not hotel projects are residential uses, the City of LA appears to have a consistently inconsistent position. Actually, though, the consistency is clear: The City will always privilege the needs of hotel developers above the City's desperate need to create and preserve affordable housing.

Additionally, the project site was *added* to the 2021-2029 Housing Element's Inventory of Adequate Sites for Housing (it had not been in the previous Housing Element's inventory). We encourage this committee to reflect on the importance of the City remaining in compliance with the state's Housing Element laws when considering this appeal.

The findings for the project acknowledge this and then hand wave this concern away, saying "the remaining sites identified in the Housing Element of the General Plan are adequate to meet the requirements of GC Section 65583.2 and to accommodate the jurisdiction's share of the regional housing need..." The finding goes on to explain how the City still must produce nearly 180,000 units of low and very-low income housing units, but it still has the remaining "capacity" to do so.

We do not consider this finding adequate. With the Olympics approaching, we understand why private investors will be eager to build hotels and other developments oriented toward short-term profit. However, the City is still struggling to explain how it will find the resources and the will to meet its RHNA requirements and make the long-term investment in the City's affordable housing stock.

By its very nature, this problem will be addressed parcel-by-parcel, one project at a time. This project extends the pattern of privileging private investment to the point of warping the meaning of the municipal code, at the expense of figuring out where, when and how we will build the affordable housing our members have been fighting for for decades.

We encourage and challenge this committee to do something that will disrupt this pattern. Figure out how we will meet the affordable housing needs of Angelenos *first*, before you continue to approve so many commercial, luxury residential and hotel projects that you reach the point where some future project's findings determine that we have only just enough "capacity" left to meet our RHNA requirements, and we've set ourselves the infeasible and impossible task of using every remaining site in the inventory for low income housing.

For these reasons we request that you sustain the appeal and reject the entitlements for the proposed project at 2005 James M. Wood Blvd.

Sincerely,



Bill Przylucki, Executive Director