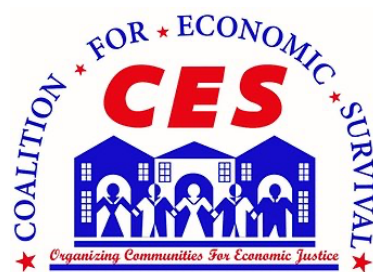


## Communication from Public

**Name:** Coalition of UH Local 11, YCS LA, CLUE, CES, KIWA, & SAJE  
**Date Submitted:** 06/05/2023 04:26 PM  
**Council File No:** 18-1242  
**Comments for Public Posting:** Please see the attached letter.

**UNITE  
HERE!  
LOCAL 11**



**KIWA**  
**WORKERS FOR JUSTICE**

**SAJE**  
**STRATEGIC ACTIONS FOR A JUST ECONOMY**

5 June 2023

Councilwoman Eunisses Hernandez  
200 N. Spring St, Room 460  
Los Angeles, CA 90012

RE: Reject Hotel Upzone, Defend Our Community (Council File 18-1242)

Dear Councilwoman Hernandez,

We the undersigned organizations and individuals urge you to sustain the appeal and reject the General Plan Amendment and Zone Change ("Entitlements") for the proposed project at 2005 James Wood Blvd ("Project"). We object to this project for two reasons: 1) there should not be a hotel on this site for the reasons cited by the previous Council Member contained herein and 2) because the proposed rooms will contain kitchenettes, this qualifies them as "dwelling units," thus triggering the Measure JJJ requirement to provide affordable housing, but the Project includes no affordable housing or in lieu fees. The Project also proposes to displace local businesses, including a panadería and a church, to which we object.

This Project should not contain a hotel use. When this Project was previously scheduled to be heard by PLUM, the previous Council Member, Councilman Gil Cedillo, issued the following statement:

The City Council has the authority to exercise discretion on land-use matters. The Council Member's position is that there is no justification for a hotel use at this site. In contrast, demand for affordable housing continues unabated, exacerbated by the pandemic, and the need to produce housing is compelling.

The Council Member agrees with the key point raised in the appeal filed by UNITE HERE Local 11 – that without a housing component, the proposed Project is inconsistent with the General, Community and Redevelopment Plans. The proposed Project does nothing to advance and conflicts with the affordable housing goals and policies. Hence, a General Plan Amendment should be not granted.<sup>1</sup>

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<sup>1</sup> [https://clkrep.lacity.org/onlinedocs/2018/18-1242\\_misc\\_01-21-21.pdf](https://clkrep.lacity.org/onlinedocs/2018/18-1242_misc_01-21-21.pdf)

Please uphold the appeal and reject the requested Entitlements for the proposed Project.

The proposed project includes habitable rooms with kitchenettes, classifying them as “residential dwelling units,” thus triggering the Measure JJJ requirement to provide affordable housing. Measure JJJ requires projects seeking general plan amendments of over 10 dwelling units to provide affordable housing. This is yet another example of how the city consistently misinterprets its municipal code to benefit hotel developers at the expense of needed housing. For example, in the Venice Place hotel project, the West Los Angeles Area Planning Commission approved a 78-room hotel project with only 4 apartments on the basis that hotels are residential uses. The Commission said that hotel was “predominately residential,” although the hotel rooms had no kitchens or kitchenettes. So too, the Commission approved several zoning concessions intended for housing projects, not large commercial developments like the Venice Place project.<sup>2</sup> Here, the developer proposes a 100-unit hotel that will have kitchenettes targeting extended-stay customers. While the City Planning Commission acknowledged the project as a “hybrid” between residential/commercial uses<sup>3</sup> and functionally the same as a dwelling unit, it refused to apply Measure JJJ affordable housing requirements for residential dwelling unit projects, with the result that, contrary to the plain requirements of Measure JJJ, no affordable housing units or in lieu fees are included as part of this project. The units in the Project should be classified as “residential dwelling units,” and the Project should therefore provide affordable housing.

In sum, we urge you to sustain the appeal and deny the Project for the reasons outlined by the previous councilmember. We need housing and small businesses, not more hotels.

Regards,

UNITE HERE! Local 11  
Youth Climate Strike, Los Angeles  
Clergy and Laity United for Economic Justice  
Coalition for Economic Survival  
KIWA (Koreatown Immigrant Workers Alliance)  
SAJE (Strategic Actions for A Just Economy)  
Victor Narro, UCLA Labor Center\*  
Ernesto Hidalgo, Worker Center Network\*  
Rabbi Susan Goldberg\*

\*Titles for identification purposes only.

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<sup>2</sup> See Appeal Recommendation Report, page A-18, <http://tinyurl.com/veniceappealreport>

<sup>3</sup> See page 16 < [https://clkrep.lacity.org/online/docs/2018/18-1242\\_misc\\_2-5-23-23.pdf](https://clkrep.lacity.org/online/docs/2018/18-1242_misc_2-5-23-23.pdf) >