



Daniel Luna &lt;daniel.luna@lacity.org&gt;

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**Public Comments Not Uploaded 18-1242\_pc\_1\_06-06-23**

1 message

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**clerk.plumcommittee@lacity.org** <clerk.plumcommittee@lacity.org>

Tue, Jun 6, 2023 at 1:02 PM

Reply-To: clerk.plumcommittee@lacity.org

To: Clerk-PLUM-Committee &lt;clerk.plumcommittee@lacity.org&gt;

----- Forwarded message -----

From: "'Raymond Padilla' via Clerk-PLUM-Committee" &lt;clerk.plumcommittee@lacity.org&gt;

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Tue, 06 Jun 2023 19:50:15 +0000 (UTC)

Subject: Public Comments Not Uploaded CF-18-1242 / Support Housing, Not Hotels, No Hotel at 2005 James M Wood (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

I agree with the previous Council Member's position that there should not be a hotel here. He said: "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." Please deny this proposed hotel.

--

Estoy de acuerdo con la posición del miembro del Consejo anterior de que no debería haber un hotel aquí. Él dijo: "La posición del miembro del consejo es que no hay justificación para el uso de un hotel en este sitio. Por el contrario, la demanda de viviendas asequibles continúa sin cesar, exacerbada por la pandemia, y la necesidad de producir viviendas es apremiante". Por favor, rechace este hotel propuesto.

Raymond Padilla

[rainman7944@yahoo.com](mailto:rainman7944@yahoo.com)

418 S Commonwealth Ave, Apt 208

Los Angeles, California 90020

----- Forwarded message -----

From: "'Kevin Reyes' via Clerk-PLUM-Committee" &lt;clerk.plumcommittee@lacity.org&gt;

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Tue, 06 Jun 2023 19:51:15 +0000 (UTC)

Subject: Public Comments Not Uploaded Stand with MacArthur Park / Westlake against Gentrification (CF-18-1242) (Item

12)

Honorable Councilmember Hernandez and PLUM Committee,

At a time when rents in MacArthur Park / Westlake are going up, we need more affordable housing not gentrification in our community. I ask you to vote NO on the final approval for the hotel project proposed at 2005 James M. Wood Blvd. Instead of benefiting the community, the proposed project allows double the square footage of hotel ordinarily allowed, has no housing component, and destroys a panadería. We need to protect our families, build more housing, and ensure development that doesn't damage our quality of life. I ask that you stand up for our neighborhood, and vote NO on the proposed hotel project!

--

En un momento en que los alquileres en MacArthur Park/Westlake están subiendo, necesitamos más viviendas accesibles, no gentrificación en nuestra comunidad. Le pido que vote NO a la aprobación final del proyecto de hotel propuesto en 2005 James M. Wood Blvd. En lugar de beneficiar a la comunidad, el proyecto a propuesto permitir duplicar los pies cuadrados de hotel normalmente permitidos, no tiene un componente de viviendas y destruye una panadería. Necesitamos proteger a nuestras familias, construir más viviendas y garantizar un desarrollo que no perjudique nuestra calidad de vida. ¡Le pido que defienda nuestro vecindario y vote NO al proyecto de hotel propuesto!

Kevin Reyes

[Kevin.Reyes47@gmail.com](mailto:Kevin.Reyes47@gmail.com)

251 Emerald Street

Los Angeles, California 90026

----- Forwarded message -----

From: "Maryam Hosseinzadeh" via Clerk-PLUM-Committee" <clerk.plumcommittee@lacity.org>

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Tue, 06 Jun 2023 19:45:31 +0000 (UTC)

Subject: Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

Please protect our neighborhood and stop an upzone / zone change with no affordable housing as part of the James M Wood hotel project. We ask that Councilmember Hernandez stand with the community on the final vote at James M Wood project and vote for housing over hotels. Please vote to deny this project which appears not to provide the affordable housing or alternative fees required by law.

--

Proteja nuestro vecindario y detenga un cambio de zona, sin viviendas asequibles como parte

del proyecto del hotel James M Wood. Le pedimos a la concejala Hernández que respalde a la comunidad en la votación final del proyecto James M Wood y vote por viviendas en lugar de hoteles. Vote para rechazar este proyecto que parece no proporcionar las viviendas accesibles o las tarifas alternativas requeridas por la ley.

maryam hosseinzadeh  
[maryamfrancesca@gmail.com](mailto:maryamfrancesca@gmail.com)  
3346 1/2 Gassen Pl  
Los Angeles, California 90065

----- Forwarded message -----

From: Karen Barajas <[karenbarajas@live.com](mailto:karenbarajas@live.com)>

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Tue, 06 Jun 2023 17:23:08 +0000 (UTC)

Subject: Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

Please protect our neighborhood and stop an upzone / zone change with no affordable housing as part of the James M Wood hotel project. We ask that Councilmember Hernandez stand with the community on the final vote at James M Wood project and vote for housing over hotels. Please vote to deny this project which appears not to provide the affordable housing or alternative fees required by law.

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Proteja nuestro vecindario y detenga un cambio de zona, sin viviendas asequibles como parte del proyecto del hotel James M Wood. Le pedimos a la concejala Hernández que respalde a la comunidad en la votación final del proyecto James M Wood y vote por viviendas en lugar de hoteles. Vote para rechazar este proyecto que parece no proporcionar las viviendas accesibles o las tarifas alternativas requeridas por la ley.

Karen Barajas  
[karenbarajas@live.com](mailto:karenbarajas@live.com)  
949 Everett St , Apt. 11  
Los Angeles, California 90026

----- Forwarded message -----

From: Jessica Craven <[jescny@gmail.com](mailto:jescny@gmail.com)>

To: Councilmember.Hernandez@lacity.org, Helene Rotolo <helene.rotolo@lacity.org>, "helen.campbell@lacity.org" <helen.campbell@lacity.org>, "ivette.serna@lacity.org" <ivette.serna@lacity.org>, clerk.plumcommittee@lacity.org  
Cc:  
Bcc:  
Date: Tue, 6 Jun 2023 10:13:23 -0700  
Subject: Public Comments Not Uploaded 2005 James M Wood Project (18-1242)  
Hi, there,

Jessica Craven, here. LACDP member, big Eunisses supporter.

I'm writing to urge y'all to reject the General Plan Amendment and Zone Change ("Entitlements") for the proposed project at 2005 James Wood Blvd ("Project").

I object to this project for two reasons: 1) It will displace local businesses, including a panadería and a church, 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.

Thanks!

Jess

----- Forwarded message -----

From: <jordan@gideonlaw.net>  
To: <clerk.plumcommittee@lacity.org>  
Cc: "Danielle Wilson" <danielle.wilson@unitehere11.org>, "Juan Muñoz" <jmunoz@unitehere11.org>  
Bcc:  
Date: Tue, 6 Jun 2023 10:11:20 -0700  
Subject: Public Comments Not Uploaded Item 12, PLUM Hearing 6/6/23: Infinitely Group Hotel Project (Council File No. 18-1242)

Dear Honorable Planning and Land Use Management (PLUM) Committee Members:

On behalf of appellant UNITE HERE Local 11 (**Local 11**), please see the attached comment letter regarding the above-referenced item involving the requested General Plan Amendment and Zone Change to allow a 100-room hotel located within the Westlake Community Plan Area. In short, former Councilmember Cedillo recommended that PLUM deny this project more than two years ago, in part because the project includes no housing. The project has not changed and now the City's Housing Element identifies the site available for up to 87 dwelling units with perhaps as many as 8-20 affordable units if utilizing TOC incentives. That is a significant loss of housing opportunity for this part of the City.

For this and other reasons, Local 11 urges PLUM to exercise its discretion and deny the requested legislative approvals—as it was prepared to do more than two years ago.

Respectfully,

**Jordan R. Sisson**, Attorney

Law Office of Gideon Kracov

801 S. Grand Ave., 11th Floor

Los Angeles, CA 90017

Office: 951-405-8127

Direct: 951-542-2735

[jordan@gideonlaw.net](mailto:jordan@gideonlaw.net)

[www.gideonlaw.net](http://www.gideonlaw.net)

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From: "Raffaella Gumbel" via Clerk-PLUM-Committee" <clerk.plumcommittee@lacity.org>

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Tue, 06 Jun 2023 17:00:34 +0000 (UTC)

Subject: Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

Please protect our neighborhood and stop an upzone / zone change with no affordable housing as part of the James M Wood hotel project. We ask that Councilmember Hernandez stand with the community on the final vote at James M Wood project and vote for housing over hotels. Please vote to deny this project which appears not to provide the affordable housing or alternative fees required by law.

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Proteja nuestro vecindario y detenga un cambio de zona, sin viviendas asequibles como parte del proyecto del hotel James M Wood. Le pedimos a la concejala Hernández que respalde a la comunidad en la votación final del proyecto James M Wood y vote por viviendas en lugar de hoteles. Vote para rechazar este proyecto que parece no proporcionar las viviendas accesibles o las tarifas alternativas requeridas por la ley.

Raffaella Gumbel

[raragumbel@gmail.com](mailto:raragumbel@gmail.com)

1151 Sunvue Pl, #5

Los Angeles, California 90012








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#### 8 attachments



**Public Comments Not Uploaded CF-18-1242 / Support Housing, Not Hotels, No Hotel at 2005 James M Wood (Item 12).eml**

19K

-  **Public Comments Not Uploaded Stand with MacArthur Park / Westlake against Gentrification (CF-18-1242) (Item 12).eml**  
19K
-  **Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12).eml**  
19K
-  **Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12).eml**  
19K
-  **Public Comments Not Uploaded 2005 James M Wood Project (18-1242).eml**  
13K
-  **2023.06.06\_Item 12\_PLUM Comment Letter\_James Woods Hotel.pdf**  
351K
-  **Public Comments Not Uploaded Item 12, PLUM Hearing 6/6/23: Infinitely Group Hotel Project (Council File No. 18-1242).eml**  
500K
-  **Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12).eml**  
19K



Daniel Luna &lt;daniel.luna@lacity.org&gt;

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**Public Comments Not Uploaded 18-1242\_pc\_2\_06-06-23**1 message

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**clerk.plumcommittee@lacity.org** <clerk.plumcommittee@lacity.org>

Thu, Jun 8, 2023 at 8:30 AM

Reply-To: clerk.plumcommittee@lacity.org

To: Clerk-PLUM-Committee &lt;clerk.plumcommittee@lacity.org&gt;

----- Forwarded message -----

From: "Andrew Seymour" via Clerk-PLUM-Committee" &lt;clerk.plumcommittee@lacity.org&gt;

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Wed, 07 Jun 2023 06:47:11 +0000 (UTC)

Subject: Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

Please protect our neighborhood and stop an upzone / zone change with no affordable housing as part of the James M Wood hotel project. We ask that Councilmember Hernandez stand with the community on the final vote at James M Wood project and vote for housing over hotels.

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Andrew Seymour

[seymourandrewm@gmail.com](mailto:seymourandrewm@gmail.com)

3332 Andrita Street #9

Los Angeles , California 90065

----- Forwarded message -----

From: "Prissma Juarez" via Clerk-PLUM-Committee" &lt;clerk.plumcommittee@lacity.org&gt;

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Wed, 07 Jun 2023 06:11:59 +0000 (UTC)

Subject: Public Comments Not Uploaded CF-18-1242 / Support Housing, Not Hotels, No Hotel at 2005 James M Wood (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

I agree with the previous Council Member's position that there should not be a hotel here. He said: "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." Please deny this proposed hotel.

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Prissma Juarez  
[pjuarez002@gmail.com](mailto:pjuarez002@gmail.com)  
509 N Avenue 50  
Los Angeles , California 90042

----- Forwarded message -----

From: Sam Toselli <LEMKE.SA@gmail.com>  
To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org  
Cc:  
Bcc:  
Date: Tue, 06 Jun 2023 20:06:44 +0000 (UTC)  
Subject: Public Comments Not Uploaded Stand with MacArthur Park / Westlake against Gentrification (CF-18-1242) (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

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normalmente permitidos, no tiene un componente de viviendas y destruye una panadería. Necesitamos proteger a nuestras familias, construir más viviendas y garantizar un desarrollo que no perjudique nuestra calidad de vida. ¡Le pido que defienda nuestro vecindario y vote NO al proyecto de hotel propuesto!

Sam Toselli

[LEMKE.SA@GMAIL.COM](mailto:LEMKE.SA@GMAIL.COM)

5419 ALDAMA ST

HIGHLAND PARK, California 90042

----- Forwarded message -----

From: "'Brian Cordington' via Clerk-PLUM-Committee" <clerk.plumcommittee@lacity.org>

To: councilmember.hernandez@lacity.org, helen.campbell@lacity.org, clerk.plumcommittee@lacity.org

Cc:

Bcc:

Date: Tue, 06 Jun 2023 21:17:07 +0000 (UTC)

Subject: Public Comments Not Uploaded Stand with MacArthur Park / Westlake against Gentrification (CF-18-1242) (Item 12)

Honorable Councilmember Hernandez and PLUM Committee,

At a time when rents in MacArthur Park / Westlake are going up, we need more affordable housing not gentrification in our community. I ask you to vote NO on the final approval for the hotel project proposed at 2005 James M. Wood Blvd. Instead of benefiting the community, the proposed project allows double the square footage of hotel ordinarily allowed, has no housing component, and destroys a panadería. We need to protect our families, build more housing, and ensure development that doesn't damage our quality of life. I ask that you stand up for our neighborhood, and vote NO on the proposed hotel project!

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Brian Cordington

[bcod14@gmail.com](mailto:bcod14@gmail.com)

2355 Scarff Apt 2

Los Angeles, California 90007

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**4 attachments**

**Public Comments Not Uploaded CF 18-1242 / 2005 James M Wood: Stand with Our Community for Housing, Councilmember Hernandez (Item 12).eml**

19K



**Public Comments Not Uploaded CF-18-1242 / Support Housing, Not Hotels, No Hotel at 2005 James M Wood (Item 12).eml**

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19K



**Public Comments Not Uploaded Stand with MacArthur Park / Westlake against Gentrification (CF-18-1242) (Item 12).eml**

19K

June 6, 2023

**VIA EMAIL & ONLINE:** (LACouncilComment.com)

PLUM Committee, City of Los Angeles  
c/o Candy Rosales, Legislative Assistant (clerk.plumcommittee@lacity.org)

**RE: Item 12, PLUM Hearing 6/6/23 (Council File No. 18-1242);  
Infinitely Group Hotel Project (DCP Case Nos. CPC-2017-712, ENV-2017-713);  
Revised RHNA/Housing Findings Lack Substantial Evidence**

Dear Honorable Planning and Land Use Management Committee Members:

On behalf of appellant UNITE HERE Local 11 ("**Local 11**"), this office submits the following supplemental comments to the City of Los Angeles ("**City**") Planning and Land Use Management ("**PLUM**") Committee and Department of City Planning ("**DCP**") regarding the above-referenced 6-story, 100-room hotel ("**Project**") proposed for a three-lot site located within the Westlake Community Plan Area ("**CPA**"). Among the entitlements sought by the Infinitely Group ("**Applicant**") are a requested General Plan Amendment and Vesting Zone / Height District Change ("**Entitlements**")—which are legislative approvals that the City has the discretion to deny.

In January 2021, former Councilmember Gil Cedillo recommended that PLUM deny the Project's requested Entitlements due to the Project's lack of housing and inconsistency with applicable land use plans. (See Figure 1 below [highlights added].)

*Figure 1: Excerpt Councilmember Cedillo's Letter Opposing Entitlements (1/21/21)<sup>1</sup>*

The City's land-use priorities should be responsive to these unprecedented changes. Indeed, 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.

Now, after more than two years since that last PLUM hearing was continued, the Applicant is seeking the same requested Entitlements despite the City's recent adoption of the 2021-2029 "**Housing Element**" that identified the site as being available to provide affordable housing per the City's Regional Housing Needs Assessment ("**RHNA**") obligations. Specifically, the Housing Element inventory indicates the site has a base zoning of 36 dwelling units and permitted a maximum of 87 units via bonus zoning incentives for affordable units. (See Fig. 2 below.) For example, as a Tier 3

<sup>1</sup> See First District letter (1/21/21), [https://clkrep.lacity.org/online/docs/2018/18-1242\\_misc\\_01-21-21.pdf](https://clkrep.lacity.org/online/docs/2018/18-1242_misc_01-21-21.pdf).

Transit Orient Communities (“TOC”) site, this could equate to roughly 8 to 20 additional affordable units (depending on the level of affordability).<sup>2</sup>

*Figure 2: Excerpt Housing Element Appendix 4.1 Inventory for the Project Site.<sup>3</sup>*

	A	B	C	D		
1	Appendix 4.1. Inventory of Adequate Sites for Housing					
2	Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number		
170418	LOS ANGELES	2009 W JAMES M. WOOD BLVD	90006	5141020021		
170419	LOS ANGELES	857 S WESTLAKE AVE	90057	5141020021		
170420	LOS ANGELES			5141020021		
* * *						
	U	V	W	X	Y	Z
	Maximum Units Allowed - Base Zoning	Maximum Units Allowed - Bonus Zoning	PIN	Community Plan Area	Rent Stabilization Ordinance	Income Category
7	23	130-5A203 62	Westlake			Lower
19	32	130-5A203 49	Westlake			Lower
10	32	130-5A203 57	Westlake			Lower

To grant the Entitlement to allow a hotel instead of the housing, the City must “make a written finding supported by *substantial evidence* as to whether or not remaining sites identified in the housing element are adequate to meet the [City’s RHNA] requirements ....” (Gov. Code § 65863(b)(2), emphasis added.) To this end, DCP staff recently issued “Revised Findings,” citing thousands of units purportedly available throughout the entire City. (See Fig. 3 below.) This City metric is an improper comparison (much less substantial evidence) given that Los Angeles is the nation’s second-largest city (approximately 473 square miles)<sup>4</sup> and purposefully divided into 35 individual CPAs (each serving as the areas General Plan Land Use Element)<sup>5</sup>—including the approximate 1,900-acre Westlake CPA where this Project is located (i.e., 2.96 square miles).<sup>6</sup> The fact is that the City routinely misses its RHNA goals and needs to prioritize housing at available sites; proposals like this usurp housing opportunities that cause the City to be out of compliance.

<sup>2</sup> See ZIMAS (indicated site is within Tier 3 TOC incentive area), <http://zimas.lacity.org/?loc=MTMwLTVMjAzICA2Mgo1MTQxMDIwMDIxClwMDkgMS05IFcgSkFNRVMgTS4gV09PRCBCTFZECgo2NDc0MzgwLjU1NTA5NDYyMSwxODQwOTcwLjk0NTAxODAxMzIsNjQ4MDI5My4wNTUwOTQ2MjEsMTg0Mzg3MC45NDUwMTgwMTMyCjEzMC01QTlwMyAgNjI%3D>; see also TOC Guidelines (2/26/18), p. 7 (indicating Tier 3 incentives for residential projects with 10-23% affordable units), <https://planning.lacity.org/odocument/39fae0ef-f41d-49cc-9bd2-4e7a2eb528dd/TOCGuidelines.pdf>.

<sup>3</sup> See also Housing Element, Chapter 4, Appendix 4.1 (Table A, Excel lines 170418 – 420 corresponding to APN 5141020021), [https://planning.lacity.org/odocument/f8e2050f-2b3b-4ca3-b793-d9ffcd2fc8d4/Appendix\\_4.1\\_-\\_Housing\\_Element\\_Sites\\_Inventory\\_\(Table\\_A\).xlsx](https://planning.lacity.org/odocument/f8e2050f-2b3b-4ca3-b793-d9ffcd2fc8d4/Appendix_4.1_-_Housing_Element_Sites_Inventory_(Table_A).xlsx).

<sup>4</sup> See <https://planning.lacity.org/plans-policies/general-plan-updates>.

<sup>5</sup> See <https://planning.lacity.org/plans-policies/community-plans>.

<sup>6</sup> See Westlake CPA, p. I-1, [https://planning.lacity.org/odocument/b189be15-6f71-43db-8a04-491fdd188729/Westlake\\_Community\\_Plan.pdf](https://planning.lacity.org/odocument/b189be15-6f71-43db-8a04-491fdd188729/Westlake_Community_Plan.pdf).

*Figure 3: Excerpt Revised Findings on Available RHNA Site (Revised Findings,<sup>7</sup> p. P-4)*

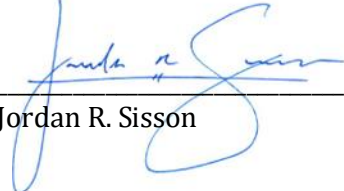
Pursuant to Government Code (GC) Section 65863(b)(2), the City finds that while the proposed project would result in fewer units by income category than those identified in the Inventory of Sites prepared for the 2021-2029 Housing Element, the remaining sites identified in the Housing Element of the 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 pursuant to GC Section 65584. As of April 1, 2023, the City's remaining RHNA Allocation for the 2021-2029 Planning period is as follows: 112,281 Very Low Income Units, 67,086 Low Income Units, 74,964 Moderate Income Units, and 168,892 Above-Moderate Income Units. As of April 1, 2023, the City has a remaining capacity of 330,056 Very Low Income Units, 332,096 Low Income Units, 63,107 Moderate Income Units, and 907,466 Above-Moderate Income Units. Therefore, the City finds that there are adequate remaining sites in the Housing Element to accommodate the remaining RHNA Allocation for the planning period.

In reality, by granting the Entitlements to permit a hotel instead of housing, the City forgoes 87 much-needed housing units (including 8-20 affordable units), which is significant for the Westlake CPA given that the CPA is relatively overcrowded and has a low potential for producing lower-income units.<sup>8</sup> The Revised Findings cannot downplay this acute localized impact by relying on purportedly available sites elsewhere in the City far away from this site and the Westlake community.

The City's Revised Findings lack substantial evidence to justify granting the Entitlements. So too, the need for housing in this area of the City has not changed since the former First District unequivocally recommended that PLUM deny the Project's Entitlements. This part of the City needs housing, not more hotels. *The City has the legislative discretion to deny the Entitlements—please use that discretion to reject this Project that provides not a single housing unit on a site that the City has identified for much-needed housing.*

Sincerely,

LAW OFFICE OF GIDEON KRACOV

  
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Jordan R. Sisson

<sup>7</sup> See [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).

<sup>8</sup> See Housing Element, pp. 97 (Map 1.6), 59 (Map 4.2), [https://planning.lacity.org/odocument/55fdecf6-e185-4910-b690-2df603093d76/2021-2029\\_Housing\\_Element\\_Book\\_\(Adopted\)\\_-\\_Low\\_Res..pdf](https://planning.lacity.org/odocument/55fdecf6-e185-4910-b690-2df603093d76/2021-2029_Housing_Element_Book_(Adopted)_-_Low_Res..pdf).