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September 17, 2019

VIA EMAIL

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Planning and Land Use Management
Committee

Los Angeles City Council
City of Los Angeles
200 N. Spring Street, Room 375
Los Angeles, CA 90012

VIA EMAIL svalenzuela@crala.org

Steve Valenzuela, Executive Director
CRA/LA, a Designated Local Authority
448 South Hill Street, Suite 1200
Los Angeles, CA 90013

Re: Supplemental Objections re: Proposed Transfer of CRA/LA Land Use
Plans and Functions; Council File No. 13-1482-S3; Agenda Item No. 15

Honorable PLUM Committee Members and CRA/LA:

This firm and the undersigned represent the La Mirada Avenue Neighborhood Association of Hollywood (“La Mirada”). In addition to our August 27, 2019 and September 16, 2019 objection letters, we submit the following further objections regarding the City’s proposed Transfer Resolution and Ordinance related to assuming CRA/LA land use plans and functions throughout the City’s 19 unexpired redevelopment plan areas (the “Project”). These comments further extend and support the testimony and written evidence submitted by La Mirada’s representative, Doug Haines, at the PLUM Committee meeting on August 27, 2019.

The City’s proposal to take authority and begin interpreting redevelopment plans contrary to the CRA/LA’s interpretation of its plans foreseeably runs afoul of this provision of Measure JJJ, and CEQA analysis of these issues is therefore additionally required:

Los Angeles Municipal Code § 11.5.8 (Added by Ord. No. 184,745, Eff. 12/13/16) concerning the General Plan Review states as follows:

“A. **Planning Areas.** The City is hereby divided into 37 planning areas. Each planning area constitutes an area for which either a community plan, a district plan, or other portion of the Land Use Element of the General Plan has been adopted by the City. The boundaries of each planning area shall be those of the applicable adopted community or district plan, or other portion of the Land Use Element of the General Plan as they existed on enactment of this section. These boundaries may be only changed by amendment to the General Plan pursuant to the procedures set forth in Section 11.5.6 of this Code. **No amendment to a plan for any of the 37 planning areas, including reduction in the number of such areas, changes in their respective boundaries, land uses permitted within or at any particular location in any such area, or any other material change, may be made until the completion of a comprehensive assessment of such proposed changes by the Planning Department to ensure that such changes do not:**

- 1. Reduce the capacity for creation and preservation of affordable housing and access to local jobs; or**
- 2. Undermine California Government Code Section 65915 or any other affordable housing incentive program; and**

The changes must include a program to create and monitor an inventory of units within the Community Plan Area that are: subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households.”
(Emphasis added.)

It does not appear that any of these municipal requirements have been analyzed in the context of the City's readiness to reinterpret residential unit density limits of the redevelopment plans it proposes to take over, or the City's recent attempt to use the CUP process to grant de facto general plan amendments and zoning changes without complying with these affordable housing and local jobs mandates of Measure JJJ.

For this additional reason, the City's proposed transfer resolution and ordinance are inconsistent with the Dissolution Law, the City's municipal code, and obligations to analyze all foreseeable direct and indirect impacts of the proposed action.

Very truly yours,

/s/ Daniel Wright

DANIEL E. WRIGHT

FOR

THE SILVERSTEIN LAW FIRM, APC

DEW:vl