

To:
City Council PLUM committee
CM Harris-Dawson
CM Cedillo
CM Price
CM Blumenfield

Date: 01/15/2019

Submitted in PLUM Committee

Council File No: 18-1088-S1

Item No. 13

Deputy: Communications from Public

From:
Susan Hunter
Los Angeles Tenants Union – Hollywood Local Case Worker
6500 Sunset Blvd.
Los Angeles, CA 90028

RE: Crossroads Development Project

Councilmembers, I am asking that you deny the approval of this project today for multiple reasons.

Firstly, it is not consistent with the Hollywood Redevelopment Plan as the EIR falsely states that it is. The project doesn't include enough affordable housing as is required under the Hollywood Redevelopment Plan. The plan doesn't have a set amount per structure, it is based on the plan area. Due to AB 1505 – The Hollywood Redevelopment Plan requirements for affordable housing are now required again and the ***applicant and their representative have been aware of this since March of last year.***

Per the Hollywood Redevelopment Plan - At least thirty percent (30%) of all new or rehabilitated dwelling units developed within the Project Area by the Agency, if any, shall be for persons and families of low or moderate income; and of such thirty percent, not less than fifty percent (50%) thereof shall be for very low-income households. **At least fifteen percent (15%) of all new or rehabilitated units developed within the Project Area by public or private entities or persons other than the Agency shall be for persons and families of low or moderate income;** and of such fifteen percent, not less than forty percent (40%) thereof shall be for very low-income households.

The EIR makes no findings on this requirement. We are clearly behind in meeting this plan requirements as an estimated 11,000 units have been built in Hollywood since 2010 and we had a deficit of over 300 affordable units in 2008. Therefore, an estimated 1657 units need to be held for affordable (especially low income) housing. Which means the city can require all 950 units in Crossroads to be affordable and then average the rest out across the other proposed Hollywood projects – or have a higher average across all the proposed projects within the CRA plan above 15%. Any units created for density bonus purposes don't count towards the goal amount as they are built in addition to the number of base units in exchange for changing the EIR on the property. Not for the number of base units as the CRA plan doesn't recognize CA GOVT. CODE SEC. 65915. (1979) as superseding the CRA plan.

Secondly, also cited under Goal 16 of the Hollywood Redevelopment Plan:

16) To the maximum extent feasible, seek to build replacement housing within the Project Area prior to the destruction or removal of dwelling units which house low- and moderate-income people.

No replacement housing has been built PRIOR to the proposed destruction of the current housing. The replacement housing would have to be built and occupied by the tenants before the destruction of the Las Palmas Courtyards can be allowed. If it is assumed that the majority of tenants would qualify for the affordable housing requirements of the new development project, then it stands to reason this justification for not creating enough separate units for right of return means the project is not in compliance with the CRA plan.

There is a dangerous precedent being set to allow affordable units to be double counted for a right of return.

By allowing the double counting of the units as affordable to get the density bonus and for the right of return for the 50 *families* (not individuals) still residing at the Las Palmas Courtyard building – that would mean that only 6% of the newly constructed units would be available for families currently looking for an affordable home. By allowing the tenants who are not at this time displaced to cut in front of a very long line of unhoused people currently looking for a home, we are just reducing the number of units being created to address our homeless crisis. The developer isn't creating 11% affordable units now available to homeless people that wasn't available before, they are only creating 5%. Therefore, they should also not be eligible for a density bonus if units are pre-promised to people selected by Councilman O'Farrell.

None of the proposed measures by the developer addresses the main issues of the displacement caused by the project and the construction of more luxury housing that will only increase the speculative real estate crisis fueling our homeless crisis that we currently find ourselves in.

Thirdly, the applicant is a bad operator who has recently been cited by the Housing and Community Investment Development for bolting a tenant's windows shut in order to harass them out of their home. The applicant, Harridge, is currently operating the property at 5825 Sunset Boulevard as an illegal hotel. Upon receiving a special usage granted by the city conditional that no tenants be evicted – Harridge and their lawyer promptly evicted the tenants by serving them 60-day notices, evicting them at Christmas of 2017. They have been cited for illegally operating and construction without the proper permits. As the applicant is currently in violation of the law and has a history of neglected repair issues and citations from HCID, this bad operator should not be entrusted with the souls of more people.

As this project is not compliant with the Hollywood Redevelopment Plan for either not having enough affordable housing, or for not providing replacement housing within the area PRIOR to the displacement of the tenants, therefore the project can't be approved at this time.

Susan Hunter
Los Angeles Tenants Union – Hollywood Local Case Worker



CODE ENFORCEMENT DIVISION - Property Activity Report

PROPERTY ACTIVITY REPORT

Assessor Parcel Number:	5545011031	Official Address:	
Council District:	Council District 13	Case Number:	698249
Census Tract:	191000	Case Type:	Complaints
Rent Registration:		Inspector:	Alfredo Balandra
Historical Preservation Overlay Zone:		Case Manager:	
Total Units:	52	Total Exemption Units:	0
Regional Office:	Central Regional Office		
Regional Office Contact:	(213) 252-2800		

Nature of Complaint: Construction performed without permits

<u>Date</u>	<u>Status</u>
12/20/2018 1:37:00 PM	Photos
12/20/2018 1:04:00 PM	Site Visit/Initial Inspection
11/27/2018 12:00:00 AM	Complaint Received



2018 - HCIDLA