

## Communication from Public

**Name:** Casey Maddren/Voters for a Superior Hollywood Plan  
**Date Submitted:** 02/12/2025 08:21 AM  
**Council File No:** 21-0934  
**Comments for Public Posting:** I'm submitting the attached comments on the Hollywood Community Plan Update on behalf of Voters for a Superior Hollywood Plan.

February 11, 2025

Vince Bertoni, Director of Planning  
Department of City Planning  
Los Angeles City Hall  
200 N. Spring St.  
Los Angeles, CA 90012

*Sent via e-mail to vince.bertoni@lacity.org, and posted to Council File 21-0934.*

Re: Hollywood Community Plan Update  
Recent Actions, Including Approval of EIR, MMP, CPIO and Associated Ordinances  
Comments from Voters for a Superior Hollywood Plan

Director Bertoni,

I'm writing on behalf of Voters for a Superior Hollywood Plan to voice our objections to the recent approvals granted by the City Council for the Hollywood Community Plan Update, the lack of proper public notice prior to the Council meeting and the city's failure to make recently updated documents available for public review prior to the meeting. This is the latest episode in a long, chaotic process in which the City has made repeated revisions to the Hollywood Community Plan over a period of years, failing to inform the public about the details of the Plan and burying important information in long and complex documents.

Regarding the most recent approvals, we'd like to address the following issues:

- Four ordinances totalling hundreds of pages were posted on January 6, the day before the Council meeting when they were approved. There was no opportunity for public review;
- Revisions had been made to these documents which were not previously disclosed;
- A linkage fee option has been added which allows developers to essentially buy additional density;
- The linkage fee is growth inducing, and its impacts have not been quantified or analyzed;
- A so-called historic preservation "mitigation measure" allows demolition of historic resources;
- The City has still not complied with LAMC 11.5.8 which requires the City to complete an inventory of affordable and RSO housing in the Community Plan Area;
- Additional information has emerged which was not analyzed in the EIR, including developments related to public services (fire/emergency), water resources and solid waste disposal

**Four ordinances were posted on the day before the Council meeting when they were approved, preventing public review**

Four revised ordinances were posted on the Council File Management System (CFMS) in the afternoon on January 6, less than 24 hours before the January 7 Council meeting. In total, these documents amounted to hundreds of pages, and there was no way members of the public could review the documents, much less provide meaningful comment. The public comment portal used by the Council only promises to post comments within 24 to 48 business hours after

they've been submitted. The fact that these revised ordinances were posted to the CFMS less than 24 hours before the meeting prevented members of VSHP from having the opportunity to review and comment on them.

An urgency clause was added to the ordinances stating that it was necessary to complete the rezoning program and publish the required ordinances by February 12 in order to comply with State law. VSHP understands the necessity for complying with State law, but the final ordinances were published and posted on January 23 (even though the CFMS erroneously shows that two ordinances posted on January 23 were posted on January 30). This means the ordinances were finalized well over two weeks before the deadline. This shows that the City could have delayed consideration of the ordinances until the January 14 meeting. Their decision to rush approval on the January 7 meeting appears to show a desire to shut the public out of the process. While the communication from the City Attorney's office states that no substantial changes have been made, the City's definition of "substantial" is likely different from ours. Based on past experience, we are concerned that revisions may have been made which could have significant impacts to the community.

Furthermore, while the City claims urgency in this matter, the rush to meet the State deadline could have been avoided if the City Council and the Department of City Planning had proceeded in a straightforward and transparent manner in updating the HCPU. The HCPU was approved in 2023, but because three council offices insisted on last minute revisions, the City has spent a year and a half making revisions in a confusing and chaotic process. How are the residents of Hollywood supposed to keep up with the City's multiple revisions, at times involving documents that are hundreds of pages long? The public was not invited to review the revisions, as should be the norm for the community plan process. And then, after delaying action for a year and a half, the City posted four revised ordinances to the CFMS less than 24 hours before the Council took final action. The Hollywood Community Plan is supposed to serve the people of Hollywood, but the COMMUNITY has been left out of the loop as Councilmembers and City Planning have made numerous significant revisions to the implementing ordinances with no meaningful effort made to engage the public or even to keep them informed.

### **Revisions had been made to the ordinances which were not previously disclosed**

Revisions have been made to the ordinances which were not previously disclosed. While the City Attorney's communication states that no substantial changes have been made, based on past experience, we are not confident that we would agree with the City's definition of the word "substantial".

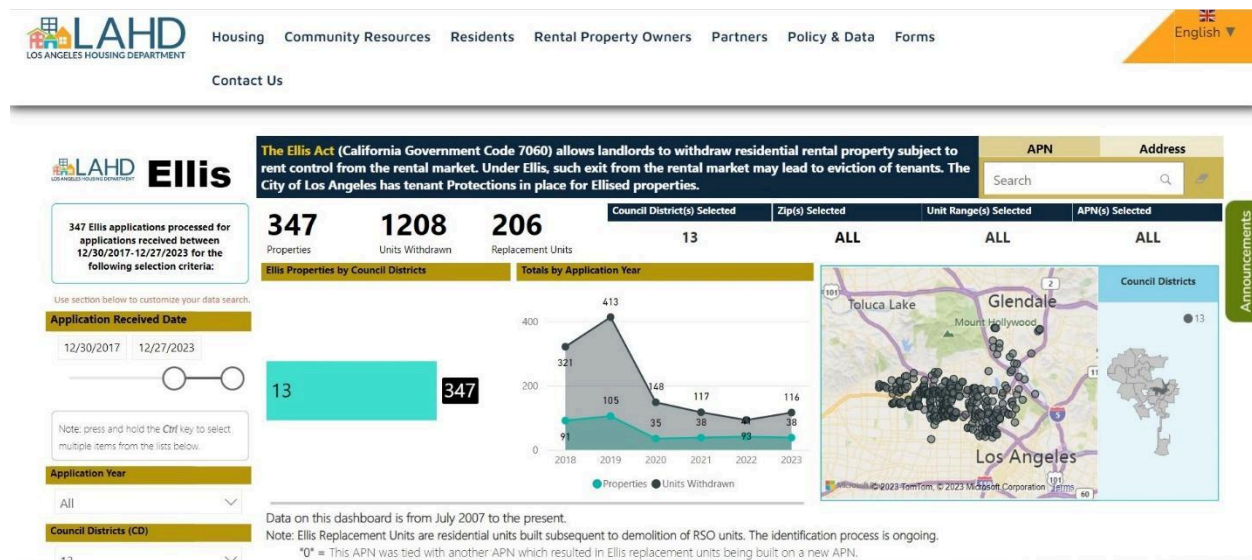
In addition to making numerous changes to HCPU documents and only publishing them at the last minute, the City did not track changes in these documents. Tracking changes is a customary practice, and necessary for members of the public to see what's been altered. When planning documents run on for hundreds of pages, it's extremely difficult for members of the public to learn what revisions have been made. We've been forced to pore over hundreds of pages of documents, comparing different versions, simply to discover what changes have been made. This is extremely time-consuming and we suspect the City is deliberately using this approach to thwart informed public engagement.

## A linkage fee option has been added which allows developers to essentially buy additional density

Under Section II.4 - Regional Center Community Benefits Program, the CPIO Ordinance now offers developers the opportunity to essentially buy additional density by paying a linkage fee, which would allow an increase in Floor Area Ratio (FAR) up to 6.75:1.

*CPIO Additional Affordable Housing Linkage Fee Project - A Project that obtains additional development rights under the Community Benefits Program through the voluntary payment of a Linkage Fee as provided in Section II-4.D.*

This option also allows additional incentives for qualifying projects. None of this was disclosed or analyzed in the EIR. Allowing developers to buy additional density will incentivize the demolition of rent-stabilized apartments and historic buildings. According to the LA Housing Department, from 2018 through 2023, 1,208 RSO units were withdrawn from the market in CD 13, which covers the majority of the Hollywood Community Plan Area.

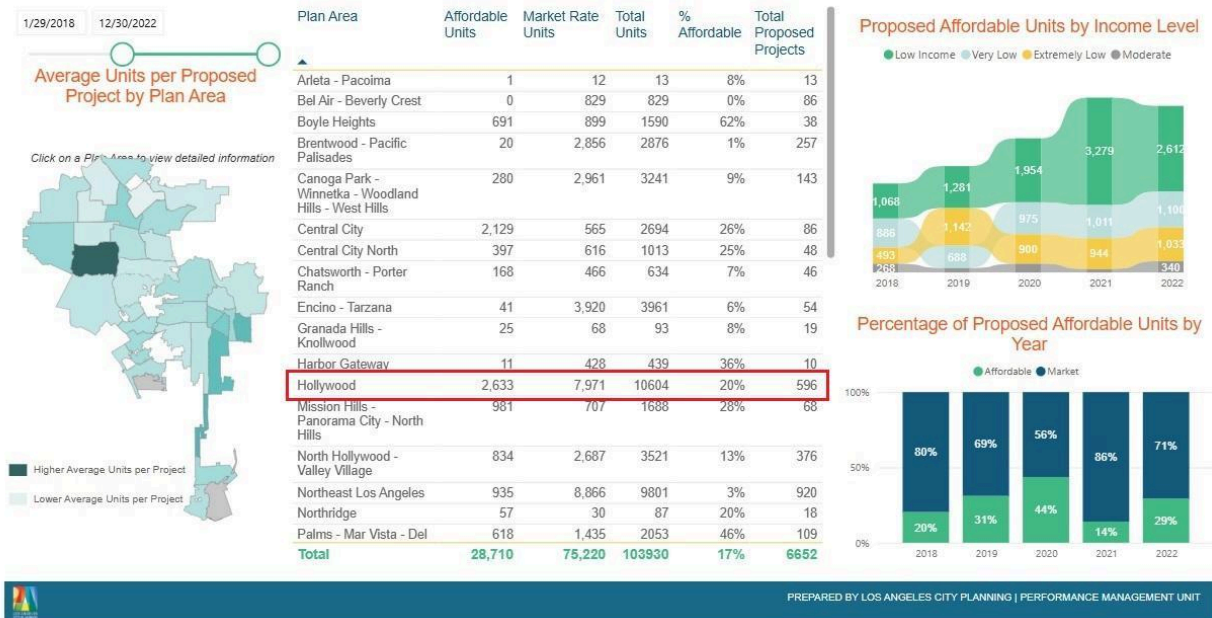


While the graphic above also records 206 replacement units approved, it appears that many of these units never got built, as in the case of Crossroads Hollywood. With the approval of Crossroads by LA City Planning in 2018, 80 RSO units were withdrawn from the market. While the developer agreed to set aside 105 affordable units out of the total 950 units approved, the project was never built. Thus, of the 206 replacement units indicated above, over half were never built.

LA City Planning's Housing Progress Dashboard shows a total of 2,633 affordable units approved from January 2018 through December 2022.

## Affordable Housing Proposed through Planning Entitlements

January 2015 - December 2022



While the LAHD graphic covers one additional year (it appears the LAHD web site no longer allows extracting data within a chosen time frame), we can see that during the same approximate time period that 2,633 affordable units were approved in the Hollywood Community Plan Area, 1,208 RSO units were withdrawn from the market. Even though the time frame and geographic boundaries are not exactly the same, it's clear that the promised gain in affordable housing is significantly diminished by the loss of existing RSO units.

But the point is that density bonus programs have incentivized the removal of existing RSO units from the market, in many cases without producing any affordable replacement units. The table below gives just three examples.

### Hollywood Area Projects Approved via Density Bonus Programs but Not Built

ADDRESS/NAME	CASE NO.	DETERMINATION DATE	TOTAL UNITS	AFF. UNITS	RSO LOST
1715 - 1739 N. Bronson	CPC-2021-6886-DB-SPR-WDI-HCA	8/16/2022	129	11	16
4629-4651 Maubert	DIR-2019-3760-TOC-SPP-SPR	8/5/2020	153	17	14
Crossroads Hollywood	CPC-2015-2025-DB-MCUP-CU-SPR	10/31/2018	950	105	80
TOTAL			1232	133	110

In each case the applicants for these projects in the Hollywood area asked for density bonuses to increase the size, and the value, of the approved project. In each case the density bonuses were granted and projects were approved but never built. In each case existing RSO units were removed from the market, for a loss of 133 RSO units. This list is not all inclusive. It represents just a sampling of the density bonus projects that have been approved under State and local law.

The point being that, while offering increased density in exchange for the payment of a linkage fee will no doubt incentivize developers to file applications for larger projects, the net gain in terms of housing, both market rate and affordable, is questionable. We find no analysis in the

approved HCPU documents of what the probable net gain might be. The City offers no projections based on data that would allow us to calculate the actual benefits of offering increased density in exchange for a linkage fee. The City fails to offer any information on existing housing lost in conjunction with existing density bonus programs. Furthermore, while the City proceeds on the assumption that the funds from the linkage fee would be used to create new affordable housing, there is no data-based projection which would allow us to calculate the possible benefits.

### **The linkage fee is growth inducing, and its impacts have not been quantified or analyzed**

The new linkage fee is growth-inducing. The linkage fee grants new by-right density increases, but the CPIO has not been analyzed for by-right buildout or associated population increases. While the original EIR provided projections on residential growth under the CPIO, there is now also EQUAL potential for increased commercial density which has not been quantified or analyzed. This, of course, poses a greater threat to existing RSO housing and historic resources, since developers can buy additional density to increase the value of a proposed project.

### **The addition of a historic preservation “mitigation measure” which allows demolition of historic resources**

One historic preservation “mitigation measure” which has been added would actually allow the demolition of historic resources if an “economic study” shows that fixing a historic resource is less profitable than building a new structure. Clearly, this is not a mitigation measure, but an invitation to the erasure of historic resources. This is one of the most telling signs that the HCPU was designed not for public benefit but for private profit.

### **The City has still not complied with LAMC 11.5.8**

The City has still not complied with LAMC Sec. 11.5.8, which states:

*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.]**

How can the City argue that the HCPU will increase access to affordable housing when it has failed to create an inventory of RSO and affordable units, as required by LAMC Sec. 11.5.8, and has failed to create the required monitoring program which would allow the City to measure success or failure?

**Additional information has emerged which was not analyzed in the EIR, including developments related to public services (fire/emergency), water resources and solid waste disposal**

In a submission to the HCPU's council file, the City Attorney's office tells us....

*...no changes to the project, circumstances, or new information (not known or capable of being known when the EIR was certified and project approved) will require a major revision of the EIR due to the involvement of new significant impacts or more severe significant impacts than those identified in the EIR. Public Resources Code § 21166; CEQA Guidelines § 15162 and 15164.*

This is not accurate. Some circumstances have changed significantly, and additional information has emerged which was not analyzed in the EIR, including developments related to public services (fire/emergency), water resources and solid waste disposal.

The Draft EIR was published in October 2019, and the Final EIR was published in August 2021. The PLUM Committee recommended approval of the EIR in April 2023, and the Council concurred shortly after. But since the publication of the DEIR there have been significant changes in LA's environmental context relating to water resources and solid waste disposal. And the recent fires, especially the Sunset Fire, raise numerous issues that the EIR does not even acknowledge.

Water Resources

The EIR's assessment of water supply for the project is inadequate. The WSA's reliance on the 2020 UWMP calls its credibility into question. While the 2020 UWMP concluded that there would be adequate water supply for foreseeable development "during average, single-dry, and multiple dry years", its projections were overly optimistic and based more on wishful thinking than actual data. The 2020 UWMP completely failed to foresee the water crisis that developed in late 2021 and early 2022. At that time the water level in Lake Mead fell so low that the Federal government was poised to assume control of water allocations. While an unusually wet spring enabled LA to avoid a devastating crisis, the potential for another such crisis still exists. Scientists have been very clear in their warnings about the decline of water resources in the LA area and in the Southwest US.

The 2021/2022 crisis saw reductions in deliveries from both the State Water Project and the Colorado River, as discussed in these stories from the LA Times:

*California considers \$500 fines for water wasters as drought worsens, conservation lags, Dec. 8, 2021 5 AM PT*

<https://www.latimes.com/california/story/2021-12-08/500-fines-proposed-for-water-wasters-amid-deepening-drought>

*As California descends deeper into drought, officials are growing increasingly troubled by dwindling water supplies and the public's lackluster response to calls for conservation, with*



*residents in recent months falling short of Gov. Gavin Newsom's request for a voluntary 15% reduction in usage.*

*Now, as the West tips toward crisis, state water regulators are considering adopting emergency regulations that will prohibit certain actions in an attempt to curtail water waste and help conserve supplies.*

*If approved, the proposal could usher in a wave of water regulations that hearken back to previous droughts while underscoring the seriousness of the current one.*

*On Tuesday, Lake Mead — the nation's largest reservoir and a lifeline for water in Los Angeles and the West — was at 1,065 feet, or about 34% of its capacity, a near-historic low. Much of California on the U.S. Drought Monitor map was painted in worrisome shades of red.*

*California slashes State Water Project allocation as year begins with record dryness, MARCH 18, 2022*

<https://www.latimes.com/california/story/2022-03-18/california-cuts-state-water-project-allocation-to-5-percent>

*After a record dry start to 2022, California water officials announced Friday that they were cutting State Water Project allocations from 15% to 5%, and warned residents to brace for a third year of drought.*

*The news came only months after a rainy December offered temporary drought relief and prompted officials to announce a modest increase in previously allocated supplies. But after the driest January and February on record — and a March on track to follow suit — officials said they had to make reductions.*

*"We are experiencing climate change whiplash in real time with extreme swings between wet and dry conditions," read a statement from Department of Water Resources Director Karla Nemeth. "That means adjusting quickly based on the data and science."*

*Other water sources for the region, such as the Colorado River, are also suffering from drought, which experts say has been intensified by climate change. The American Southwest has experienced its driest 22-year period in 1,200 years, research shows.*

*None of this was foreseen by the 2020 UWMP, which came to the reassuring conclusion that LA had enough water to grow indefinitely. The 2020 UWMP failed to acknowledge the possibility of a crisis like the one that LA faced in 2021/2022, even though, as the article above states, the region had been experiencing its driest period in 1,200 years. The 2020 UWMP lacks credibility, and the WSA's reliance on its conclusions also call into question the reliability of the WSA.*

*The risk of another water crisis is still very real, as demonstrated by these two more recent stories:*

*California sets initial State Water Project allocation at 5% following hot, dry stretch, Dec. 2, 2024*  
<https://www.latimes.com/environment/story/2024-12-02/california-sets-initial-state-water-project-allocation-at-5>



*California water managers have announced their preliminary forecast of supplies that will be available next year from the State Water Project, telling 29 public agencies to plan for as little as 5% of requested allotments.*

*The state Department of Water Resources said Monday that the initial allocation is based on current reservoir levels and conservative assumptions about how much water the state may be able to deliver in 2025.*

*"We need to prepare for any scenario, and this early in the season we need to take a conservative approach to managing our water supply," DWR Director Karla Nemeth said.*

*'Zero progress': Western states at impasse in talks on Colorado River water shortages, Dec. 10, 2024*

<https://www.latimes.com/environment/story/2024-12-10/colorado-river-divisions>

*Negotiations over the last year have brought "zero progress," said JB Hamby, California's Colorado River commissioner. He blamed the upper basin states for an entrenched position resisting participation in the cutbacks, which he said is untenable.*

*It's worrying that there is a "widening chasm" between the sides, Hamby said. "We are running out of time, and we're no closer to much of anything at this point than at the beginning."*

### Solid Waste

The EIR's analysis of impacts related to solid waste is inadequate and fails to acknowledge the serious challenges the City of LA faces in dealing with this issue. The EIR also fails to include new information which was not available at the time it was prepared. The City of LA has no operating landfills. It relies primarily on the Chiquita Canyon and Sunshine Canyon Landfill, which are maintained by LA County.

Because of serious ongoing problems at Chiquita Canyon, that landfill will stop accepting solid waste in 2025. There are also serious ongoing air quality issues related to the Sunshine Canyon landfill which have yet to be adequately addressed. The HCPU EIR also assumes that recycling will significantly reduce the amount of solid waste generated by population growth, but the assumptions are overly optimistic. The HCPU will cause significant impacts with regard to solid waste, and these impacts are not addressed in the EIR.

The Initial Study asks if the project will:

*Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

*Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The population growth projected in the EIR will cause a massive increase in solid waste produced within the plan area, but both the solid waste and recycling infrastructure are inadequate to deal with this increase. Also, the authors assume the City of LA's compliance with AB 939, which is a major mistake. AB 939 requires local jurisdictions to recycle 50% of

their solid waste, but the City has been out of compliance with this law for years. The RecycLA program has never achieved the State-mandated 50% waste reduction target.

The September 21, 2023 memo from LASAN regarding RecycLA contracts contains the June 2023 RecycLA Update, which outlines the program's progress.

[https://clkrep.lacity.org/online/docs/2023/23-1032\\_misc\\_9-21-23.pdf](https://clkrep.lacity.org/online/docs/2023/23-1032_misc_9-21-23.pdf)

On page 32 of the RecycLA Update, Table 7, Landfill Reduction Liquidated Damages, shows that most RecycLA contractors failed by a wide margin to reach their targets for diversion to recycling, even though in most cases those targets are well below 50% of total estimated waste.

In the past, the City of LA has asserted that it doesn't matter if the City isn't meeting State-mandated recycling targets, arguing that ample space exists in landfills to deal with the waste generated. However, it's become clear that the two landfills that the City primarily relies on, Chiquita Canyon and Sunshine Canyon, are no longer able to meet air quality standards. Residents near Chiquita Canyon have been especially impacted, reporting headaches, nausea, dizziness and respiratory issues due to the stench emanating from that landfill. Because operator Waste Connections has been unable to resolve the ongoing air quality problems, LA County has filed a lawsuit to force compliance.

Los Angeles County files suit 'to stop the awful stench' at Chiquita Canyon landfill, Dec. 17, 2024 3 AM PT

<https://www.latimes.com/environment/story/2024-12-17/los-angeles-county-sues-chiquita-canyon-landfill>

*For nearly two years, trash has been smoldering in a long-dormant portion of Chiquita Canyon due to the rare chemical reaction. The broiling temperatures have affected a roughly 30-acre area, where putrid gases and hazardous liquids have burst through the surface of the landfill.*

*Although regulators have ordered Chiquita Canyon staff to take steps to contain the reaction, many of their efforts have been delayed or have failed to stop the stench from drifting into the nearby communities of Castaic and Val Verde.*

*On Monday, Los Angeles County filed a lawsuit against Chiquita Canyon's owner, Waste Connections, claiming that its efforts have not been sufficient to extinguish the smoldering reaction and end the ongoing public nuisance, which the landfill's staff acknowledges could persist for years.*

### Complaint, LA County v. Chiquita Canyon LLC & Waste Connections

#### INTRODUCTION

1. *For almost two years, a smoldering, smelly, chemical brew has been festering underground at the Chiquita Canyon Landfill (the "Landfill") in Castaic, California, releasing noxious odors into the air and severely impacting the quiet enjoyment of neighboring homes and businesses. This Class III Landfill occupies 639 acres and is a mere 500 feet from the Val Verde residential community. The area generating these odors and chemicals occupies more than 30 acres in the Landfill's northwest corner*

*nearest this community. But the reach of the noxious brew is broader, impacting the quiet enjoyment of numerous adjacent neighborhoods. As this brew smolders, landfill gas temperatures and subsurface temperatures rise, releasing odors that severely and persistently impact the nearby neighborhoods of Val Verde, Hasley Canyon, Hasley Hills, North Bluffs, Hillcrest, Live Oak, Williams Ranch, Santa Clarita, Stevenson Ranch, and Valencia.*

- 2. Among other noxious odors and gases, the brew releases hydrogen sulfide and dimethyl sulfide into the air. And when rain falls on the Landfill, water filters through the waste and the brew, drawing out chemicals to form enormous amounts of liquid leachate. The increased pooled and flowing leachate resulting from the brew creates additional fumes and foul-smelling odors.*
- 3. As residents in the area began feeling the impacts of this brew, they reported effects such as headaches and nausea; eye, nose, throat, and skin irritations; dizziness; difficulty breathing; and even cardiac problems. Residents have also reported being forced to remain indoors, keeping their doors and windows closed. They have had to avoid using their yards or taking part in the outdoor activities that are a key feature of life in this scenic part of the County of Los Angeles. Children are unable to play outside and residents cannot even indulge in the simple pleasures of an outdoor barbeque or playing ball with their children in their own backyards.*

Air quality issues at Sunshine Canyon Landfill have also been a consistent problem, with Supervisor Lindsey Horvath requesting an audit this year in an attempt to find a solution.

*Board Approves Audit of Sunshine Canyon Landfill. Supervisor Lindsey Horvath. April 9, 2024*  
<https://lindseyhorvath.lacounty.gov/board-approves-audit-of-sunshine-canyon-landfill/>

*Los Angeles, CA – The Board of Supervisors today directed an audit of Sunshine Canyon Landfill through a motion authored by Board Chair Lindsey P. Horvath and Supervisor Kathryn Barger. The audit will study odor mitigation measures following historic rains that have increased odor issues, impacting the neighboring communities of Sylmar and Granada Hills.*

*“Odor issues at Sunshine Canyon have persisted for too long with too little improvement,” said Board Chair Lindsey P. Horvath. “Los Angeles County is calling for an independent study to hold the operator accountable for making the changes the residents deserve, and that make this site resilient to the new normal of intense storms made worse by climate change.”*

The HCPU EIR was written before the current solid waste crisis developed. It could not have projected the closure of Chiquita Canyon. It does not acknowledge the failure of the RecycLA program to meet recycling targets required by the State of California.

## Fire

It may seem that the EIR could not have anticipated the devastating fires of 2025, including the Sunset Fire, but in fact, fires are part of LA's ecology, and the Hollywood Hills have burned a number of times. Brush fires are fairly common in hillside areas, and are usually knocked down quickly, but the recent destruction in Palisades and Altadena show that there is little that firefighters can do when high winds are driving a fire. Thankfully, LAFD was able to quickly stop the Sunset Fire, but the number of recent fires and the destruction they have wrought have

highlighted deficiencies in planning, infrastructure and services which were not acknowledged or addressed in the EIR.

Below you will find a transcript of comments made by reporter Mike Rogers regarding the traffic jams that resulted from the effort to evacuate during the Sunset Fire.

*California official on evacuation orders as Sunset Fire burns in Hollywood Hills, Jan 8, 2025*  
<https://www.cbsnews.com/video/california-official-expanded-evacuation-orders-sunset-fire-burns-hollywood-hills/#x>

*L.A. City Councilmember Nithya Raman told CBS News Los Angeles the latest updates on the Sunset Fire burning in the Hollywood Hills on Wednesday evening. She urged anyone in the evacuation order area to leave calmly and immediately. CBS News Los Angeles' Mike Rogers reports on the traffic.*

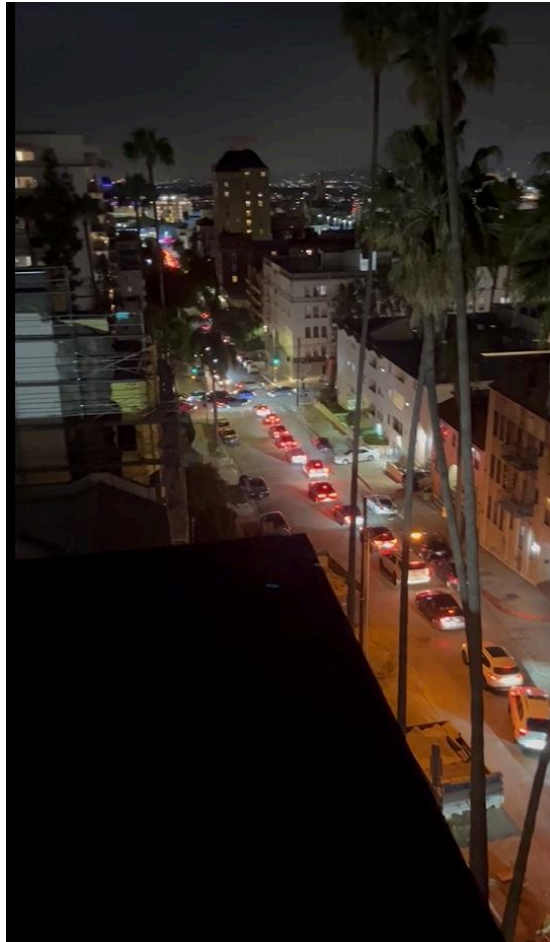
*Transcript of reporter Mike Rogers' comments on evacuation traffic, which start at 2:30:*

***"Traffic is an absolute nightmare. Everywhere. Laurel Canyon to the south is a mess. Hollywood Blvd. is a mess. Sunset Blvd. is a mess. If people are leaving, the further south they can go and then go east or west if you need to, the better, because Sunset and Hollywood are totally jammed up. The other thing I want people to know [...] is that Sunset is also closed in both directions for a fire staging area at Hayworth, and that actually runs more to the west, past Fairfax and that area."***

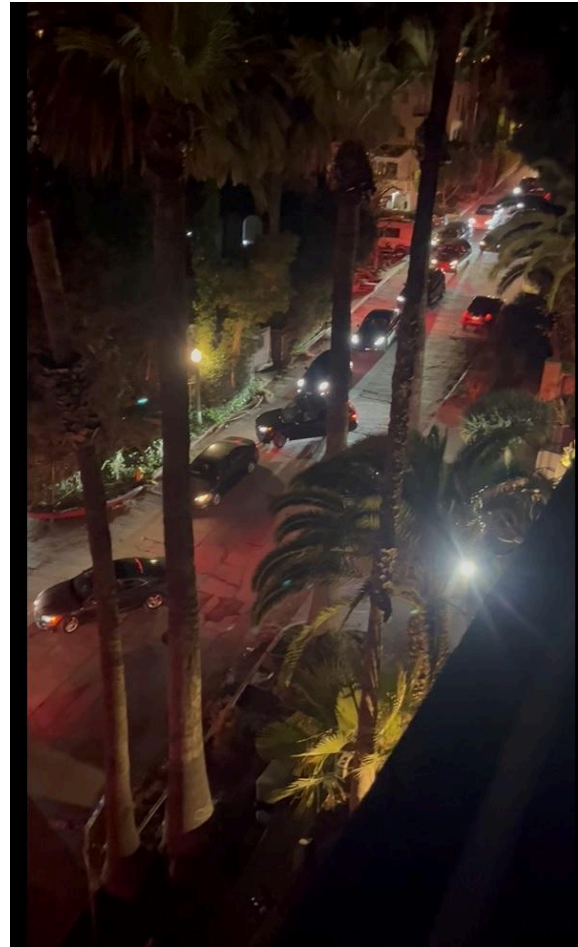
Fortunately, the Sunset Fire was knocked down quickly and there were no deaths, but had the winds risen and the fire spread, the outcome could have been much worse. It's clear that the corridors residents relied on were backed up with traffic. Had the fire spread more quickly, it's likely residents would have found themselves in the same kind of peril faced by Palisades residents when they tried to flee that fire via Sunset Boulevard.

But over a mile east of the burn area, even in an area where an official evacuation order had not been issued, there were also traffic back-ups. Hollywood resident Jeff McDonough, who lives on the 1900 block of Whitley, took video of the line of cars stretching from Franklin all the way up to Whitley Terrace. These two stills are from his video.

*[SEE NEXT PAGE FOR IMAGES.]*



*View of 1900 block of Whitley facing south toward Franklin on night of Sunset Fire.*



*View of 1900 block of Whitley facing north on night of Sunset Fire.*

Obviously, even though the area wasn't under an evacuation order, traffic was backed up north of Franklin on Whitley Avenue, normally a quiet residential street with little traffic.

It's also important to note, with regard to evacuation corridors, that the City has begun implementing a plan to remove traffic lanes from Hollywood Boulevard. The first phase, on a stretch east of Western, has already been completed. The November 19, 2020 Community Meeting Presentation of the Hollywood Walk of Fame Master Plan prepared by Gensler, with LA BOE, shows that there are plans to also remove traffic lanes from Hollywood Boulevard between Argyle and La Brea. Clearly, with the traffic jams seen on the night of the Sunset Fire, this has the potential to make a bad situation worse in case of an evacuation. These changes were not acknowledged or assessed in the EIR.

This becomes even more concerning when we look at Ordinance No. 187823, the ordinance amending the zoning map for the Hollywood Community Plan Update. The ordinance shows that numerous parcels along Franklin Avenue between Cahuenga and La Brea have been upzoned, and also a few parcels north of Franklin. This is disturbing for two reasons: 1) Franklin is often congested under normal rush hour conditions. If an evacuation were ordered, during rush hour, as it was on the night of the Sunset Fire, the quote above from reporter Mike



Rogers makes clear what the results are; and 2) Almost all the parcels north of Franklin are designated as Very High Fire Hazard Severity Zones. It's hard to understand why the City has chosen to add more density to VHFHSZ communities that have been repeatedly threatened by fires. Fortunately, the winds were not strong on the night of the Sunset Fire. We may not get so lucky next time.

(It's especially interesting to note that the City has chosen to upzone parcels in the Whitley Heights neighborhood, at 1944 Whitley, 1949 Grace and 1942 Grace. After looking at the stills above of the traffic jam on the night of the Sunset Fire, it's hard not to draw the conclusion that by adding more density to the Whitley Heights neighborhood, a Very High Fire Hazard Severity Zone, the City is begging for disaster.)

Voters for a Superior Hollywood Plan is both frustrated and disappointed that after a years-long process, the final result is a Hollywood Community Plan Update that violates both local and State law, and seems designed primarily to benefit real estate investors while providing little benefit to the citizens who live in Hollywood.

We'd like to point out that the City Council has approved the HCPU on two separate occasions over a year and a half apart. Council File 21-0934 first states "Council action final" on 05/09/2023. This was followed by a 5/22/2023 letter from you, Director Bertoni, in which you noted the following:

*On May 3, 2023, the City Council adopted the PLUM Committee's report with additional amendments. On May 11, 2023, the Hollywood Community Plan's zoning ordinance was posted to the Council File (Ordinance 187,823) with an effective date of June 18, 2023. However, the zoning ordinance does not incorporate the amendments noted in PLUM's Recommendation to City Council. In addition, the zoning ordinance is not meant to go into effect until the underlying General Plan Land Use Designations, and supporting Community Plan Implementation Overlay (CPIO) also go into effect. The CPIO has been referred to the City Attorney for form and legality, and will be presented to the City Council for final adoption at a future date.*

*This means that if the zoning ordinance goes into effect on June 18th, it would be in conflict with Government Code Section 65860, which requires that a city's zoning ordinance be consistent with the general plan. It also means that the zoning ordinance would not be supported by the various regulations contained within the CPIO. To ensure the City's zoning ordinances are in compliance with State law as being in conformity with the general plan, the resolution for the Hollywood Community Plan specified that the community plan amendments would not be operative until the zone changes, the Hollywood CPIO, and the Hillside Construction Regulation Overlay Ordinance are adopted by the City Council.*

Based on the above, you stated that LA City Planning recommended that the City Council should rescind the Hollywood Community Plan zoning ordinance, and direct the Department of City Planning to prepare a corrected zoning ordinance.

Letter from Bertoni to LA City Council, May 22, 2023  
[https://clkrep.lacity.org/online/docs/2021/21-0934\\_misc\\_5-23-23.pdf](https://clkrep.lacity.org/online/docs/2021/21-0934_misc_5-23-23.pdf)

The City Council followed your recommendation, rescinding the original approval on 06/16/2023. Over a year went by, with further revisions made to the Plan. The HCPU was

scheduled to be considered by the Council in December 2024, but an amending motion was filed on 12/13/24, followed by another amending motion on 1/7/25, when the Plan was finally approved. During this extended process, lasting over a year and a half, multiple revisions were made, but neither City Planning nor council offices made any meaningful effort to involve the general public. Making things even more difficult and confusing for members of the public, the published documents provided no indication of where revisions had been made. Anyone trying to understand the changes would have had to compare different versions of documents page by page, and in some cases these documents were hundreds of pages long. There appears to have been a deliberate effort to thwart transparency and keep the members of the Hollywood community in the dark.

We submit this letter not only to note the multiple flaws in the Plan and in the process surrounding it, but to convey the deep frustration and sense of betrayal that we feel. This is not the way community plans should be written.

Sincerely,  
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