

## Communication from Public

**Name:**

**Date Submitted:** 04/21/2023 01:17 PM

**Council File No:** 21-0934

**Comments for Public Posting:** Dear PLUM Committee: Please find the enclosed. Thank you.

April 20, 2023

Dear Members of the PLUM Committee:

Please read our letters.

The Hollywood Community Plan Update (“HCPU”) recommended by City Planning must have revisions. Particularly, to repair the gaping hole where historic preservation used to live.

Please recall when the city first created the Cultural Heritage Board in 1962 and when our then Mayor stepped in to ensure the city’s historic heritage were protected (see Attachment 1).

By 1963 the Ordinance was referred to as: “*a city law with teeth in it*” (see Attachment 2) and by 1980:

*“There is a popular fascination with local culture. Preservation groups like Keep Old Los Angeles, the Hollywood Heritage Society and the Los Angeles Conservancy are sprouting up, picketing the demolition of buildings ignored for decades. **Los Angeles has discovered its roots** (Rinard, 1982) (see Attachment 3).*

In 1982 **more than 200 volunteer residents combed the streets of the city, block by block (Hollywood included)**, to earmark historical sites (Kaplan, 1982). The efforts made by citizens alone, should be acknowledged and protected by the city as having historical significance (see Attachment 4).

*“New **national awareness also is occurring** because the preservationist movement itself is changing from one concerned with saving distinctive buildings as museum pieces to **restoring neighborhoods with a sense of history as places where people live and work**. “It has taken some time for preservationists in the national movement to recognize that the West has a rich architectural and cultural heritage, but it’s happening and we are pleased,” (Kaplan, 1982).*

When the city council writes its motions, many of them begin with context referencing historical background. We reference historical background because it’s what we use to build on. It is what got us where we are, in every sense. Authorities within this city have made historic preservation a blood, sweat and tears battle, that has created and intensified a great divide between developers and the city on one hand, and regular residents having no financial interest in their efforts on the other. Never has this segregation been so apparent as it is today. The version of the HCPU before you is demonstrative of the same. Not only is the update void of what the communities have been shouting from the rooftops in terms of what is needed, it brazenly implies the planning department’s top hit song of ‘no impact’ applies, which claims none of these changes impose impacts on our quality of life or the general

welfare of the public - says the planning department; the self-appointed body delegating themselves as qualified to measure the amount of “quality” each of us gets.

Recall when Councilmember Zev Yaroslavsky proclaimed how “LA’s planning problems made the U.S.S.R.’s problems look simple” (Davis, 1991).

***“Yet Los Angeles should be equally concerned about the skeletons rattling around in the closets of the Department of Planning. Indeed, to use a noir metaphor, the venalities of planning (Davis, 1991) (see Attachment 5).***

Los Angeles IS concerned. The large elephant that lives in City Hall remains the fact that current Los Angeles City Planners **choose to NOT execute effective planning strategies that seamlessly co-exist with historic resources**. The PLUM Committee voting in lock-step, green-lighting more of the planning department’s “recommendations”, including the current version of the Hollywood Community Plan Update before you, will let all of us know what the rest of your term as our alleged representatives is going to look like.

The city has been advertising “housing crisis” since 1945, and nearly every decade since (see Attachment 6). Through all those years, **your predecessors worked with their communities to STRENGTHEN HISTORIC PRESERVATION to ensure our cultural and historic resources would be immune from destruction**. While this is a much broader topic than what is currently before you, the takeaway is always going to be the same - PLANNING’S “RECOMMENDATIONS” are infused with problems.

Please also note, the current version of the HCPU suggests Griffith Park and the Santa Monica Mountains *are* the city’s “open space”, insinuating there is no need for “open space” in Hollywood, or a need for views, or light, or more than an arms length in between buildings. Complaints are made when coyotes or raccoons appear on streets, not recognizing the planning department has designed our co-inhabitants out of their habitat, by neglecting to consider the impacts on them in each and every project approval - which adds up (also known as “cumulative”). Our local wildlife and open space exists in Hollywood’s backyards and the remaining hillside areas, and in our local flora which is what defines our local ecosystems. Reducing setbacks even further compromises this biodiversity (Please see *“increasing amounts of Los Angeles residents seek refuge from the surrounding city” The effects of future urban development on habitat fragmentation in the Santa Monica Mountains, Swenson et al., 2000*). There are no protections for existing mature trees, parks, wildlife or the minuscule areas of open space in Hollywood that remain. Removing historical resources, removing our open space thereby removing wildlife, removes residents from the city as seen again, in the latest census data showing Los Angeles had the LARGEST POPULATION DECLINE two years in a row since 2021 (USCB, 2023) (see Attachment 7). The HCPU describes unreasonable “plans” that have not considered our changing climate, and the feedback loops produced by the proposed changes it outlines (Please see *The Urban Heat Island\_Implications for Health in a Changing Environment, Heaviside et al., 2017*)

Finally, for the new Councilmembers on the PLUM committee, please note that although we did elect a new Mayor, she has failed to appoint a new planning director. She has failed to appoint new planning commissioners. The city's Office of Historic Resources is run by the planning department! Please recall and reflect on the conversations you had with constituents, **prior** to being elected, wherein you were informed how **the Department of City Planning is the root of all problems in this city**. You were given names, you were given case numbers, you were given "substantial evidence" demonstrating why this department is well beyond an overhaul and will hopefully be the next city department shaken down by the FBI. It is our elected representatives we choose to vote into office to "represent" us; we do not vote for city planners who wind up pulling the strings of the councilmembers.

Historic resources and potential historic resources need protection and must be off limits. Period. I lend my support to Hollywood Heritage as well as to other individuals who are urging you to reject this shameless HCPU.

Thank you.

J.G.

#### WORK CITED:

Heaviside, C., Macintyre, H. & Vardoulakis, S. (2017). The Urban Heat Island: Implications for Health in a Changing Environment. *Curr Envir Health Rpt* 4, 296–305. <https://doi.org/10.1007/s40572-017-0150-3>

Hebert, Ray (1962). City Acts to Save Historic Monuments: Council Creates 5-Member Board on Cultural Heritage. *Los Angeles Times (1923-Current File)*; Jan 16, 1962; *ProQuest Historical Newspapers*: pg. B2

KAPLAN, SAM HALL (1982). Preservation Takes Root in L.A.: Architectural Heritage Recognized at Last PRESERVATION. *Los Angeles Times (1923-Current File)*; Jan 25, 1982; *ProQuest Historical Newspapers*

KAPLAN, SAM HALL (1982). Searching for L.A.'s Preservable Past: L.A. PAST: Looking Block by Block. *Los Angeles Times (1923-Current File)*; Mar 17, 1982; *ProQuest Historical Newspapers*: pg. OC\_D2

LAT (Los Angeles Times) (1963). PRESERVATION OF HISTORIC STRUCTURES BACKED BY LAW. *Los Angeles Times (1923-Current File)*; Mar 10, 1963; *ProQuest Historical Newspapers*: pg. GB6

LAT (Los Angeles Times) (1975). CULTURAL HERITAGE LAW TO BE TOPIC OF HEARING. *Los Angeles Times pg. (1923-Current File)*; May 25, 1975; *ProQuest Historical Newspapers*: SG2

Rinard, Peggy (1980). Heritage Board Guards Legacy: HERITAGE BOARD. *ProQuest Historical Newspapers: Los Angeles Times pg. J16*

Swenson, J.J., Franklin, J. The effects of future urban development on habitat fragmentation in the Santa Monica Mountains. *Landscape Ecology* 15, 713–730 (2000). <https://doi.org/10.1023/A:1008153522122>

USCB (United States Census Bureau) (2023). Growth in the Nation's Largest Counties Rebounds in 2022. Counties with large colleges and universities experience population gains once again. *Census.gov*

# City Acts to Save Historic Monuments

## Council Creates 5-Member Board on Cultural Heritage

BY RAY HEBERT

Times Urban Plans Editor

The City Council decided Monday to do something about preserving buildings and sites that have historic or cultural significance.

It ordered the drafting of an ordinance creating the Cultural Heritage Board, a five-member advisory group that would catalogue the city's historic buildings, monuments and other cultural features.

The proposed ordinance would allow the board time to rally the support of individuals and private societies interested in saving structures earmarked for demolition.

### Destruction Cited

"Not a day passes but some form of development in the city causes destruction," said William Woollett, chairman of the Preservation of Historic Buildings Committee of the American Institute of Architects' Southern California.

"This destruction often includes things which in the past have identified Los Angeles culture not only through her buildings . . . but through her great trees and her many historic sites. These things have helped to shape the color, character and culture of our city, and they should continue to do so."

He pointed out that a "thriving and happy city does not live and grow 'by bread alone,' meaning highways, shopping centers, manufacturing plants and just places to live and work."

Already, he told the council, the AIA has recorded about 25 Los Angeles buildings for their historic value "but no protection whatever is afforded them."

### Protect Landmarks

"This ordinance is designed to preserve the valuable landmarks of the past and those things which might very well become landmarks of the future from careless and thoughtless destruction," said Eddy S. Feldman, vice president of the Board of Municipal Art Commissioners.

Working under the commission, the board would make an inventory of buildings, monuments, trees and other sites of historical importance.

Should a permit be sought for the demolition of a specific structure or site, the board would have 15 days to object, if it is interested in its preservation. This action would suspend the issuance of a permit for not more than six months.

The board may seek an additional six months moratorium if it believes it needs that long to save the structure.

First steps to set up the Cultural Heritage Board were taken in mid-1958 when representatives of the AIA and other civic and business groups met to formulate a legislative program.

ATTACHMENT 1

# PRESERVATION OF HISTORIC STRUCTURES BACKED BY LAW

(This is the second of two articles on the preservation of historical buildings in this area.)

Los Angeles has taken a giant step forward with the establishment by ordinance of a Cultural Heritage Board, which has the job of preserving and protecting the landmarks of the past.

For the first time, there is a city law with teeth in it that can prevent a property owner from destroying an historic building—up to a maximum of 360 days.

"This means we can preserve our valuable historic assets and still protect the rights of the property owner," says William Woollett, Los Angeles architect who heads the board.

For example, the board has already declared several sites to be historical structures, and the owners are specifically enjoined from destroying or altering them without permission of the Cultural Heritage Board.

## Tujunga Structure

The historic Bolton Hall at Commerce Ave. and Valmont St., Tujunga, is one of the structures.

In its official action stamping Bolton Hall as a historic site, the board has put itself squarely in the controversy over whether to rehabilitate or demolish the structure, which recreation and park department reports have labeled "an obsolete building."

The hall, built in 1913, has stood empty and deserted for years on a weed-choked lot. Vandals have left their mark on the historic landmark many times.

The parks department recently earmarked an undisclosed amount from bond sales to acquire land adjacent to the building for a park. The department also spent several hundred dollars repairing the vandalism when it took over the structure last May.

## Citizens Committee

A 10-member citizens committee, led by Ray W. Brooks of Tujunga has been formed to preserve Bolton Hall. They are endeavoring to stir up community interest in saving the building. Frank E. Mosher of Glendale, who is on the committee for the preservation of historic buildings in the Southern California chapter of the American Institute of Architects, is assisting the group in an advisory capacity.

The cost of rehabilitating the structure is estimated by city officials at \$40,000. A parks department spokesman points out that funds are not available for such a project.

Bolton Hall's fate stands in abeyance. However, any move to tear down the old structure will run into a

series of hurdles set up by the Cultural Heritage Board.

Under the city's new ordinance, all applications for demolition, major alteration or removal must be checked against the list of historic buildings issued by the board.

If the owner of a building on the list applies for a permit, the application is automatically referred to the heritage board, which has 15 days to file an objection. An objection blocks issuance of a permit for at least 30 days.

Before the end of that time, the property owner can ask the city Art Commission to cancel the objection of its subsidiary board, and if the objection is cancelled, then the alteration, removal or demolition can go ahead.

## Time Factor

However, if the Art Commission refuses to cancel the objection, then granting of the permit can be postponed for up to 360 days, giving the Cultural Heritage Board and other interested groups time to gather community financial and moral support for saving the historic building.

Wollett, a Glendale resident, points out that the decision to put the "historic" label on a structure follows careful guidelines. The code definition is as follows:

... Any site (including significant trees or other

plant life located thereon), building or structure of particular history or cultural significance to the city of Los Angeles."

Historic sites are those in which "the broad cultural, political, economic or social history of the nation, state or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state or local history, or which embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period style or method of construction, or a notable work of a master builder, designer or architect whose individual genius influenced his age."

## Other Board Members

The board includes Woollett, past chairman of the preservation of historical landmarks committee of the Southern California chapter, American Institute of Architects; Carl Dentzel, director of the Southwest Museum in Highland Park; Mrs. Bonnie Riedel, city commission member; Mrs. Edith Gibbs, amateur historian, and Mrs. Francis Sullivan, state chairman of California history and landmarks committee, Native Daughters of the Golden West.

ATTACHMENT 2

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microfilm.

**LANDMARK NOMINEE**--El Greco apartments on Tiverton Avenue in Westwood has been

voted for designation as a historical monument by the city's Cultural Heritage Board.

Photo for The Times by Ann Summa

FORMED IN '62

## Heritage Board Guards Legacy

By PEGGY RINARD

From adobe ranchos to Victorian clapboards, from the California bungalow to hot dog stands that look like hot dogs, from art deco movie palaces to the uncluttered designs of Frank Lloyd Wright and the angular International Style--out of a cultural confusion unequaled anywhere a heritage somehow takes shape.

Acting as guardian of this architectural legacy is the Cultural Heritage Board, a body of five, in existence only since 1962. Until the last few years, the board worked relatively unnoticed. Its concerns were esoteric. After all, Los Angeles was the city without a history. What was there to preserve? Most Californians, being migrants, had histories elsewhere and were unconcerned with the definition of a cultural heritage for Los Angeles.

Now, however, indifference has been replaced by passionate interest. There is a popular fascination with local culture. Preservation groups like Keep Old Los Angeles, the Hollywood Heritage Society and the Los Angeles Conservancy are sprouting up, picketing the demolition of buildings ignored for decades. Los Angeles has discovered its roots.

"Well, it's taken them long enough," Ileana Welch, CHB coordinator, says somewhat dryly. "I've been talking to so many people lately my head is in a muddle. The last board meeting was absolutely packed.

At that meeting the board voted to designate three historical monuments: the Laurelwood apartments, the Janes house and the El Greco apartments. All designations are subject to the approval of the City Council.

The Laurelwood, located on Laurelwood Drive in Studio City, was designed by R.M. Schindler, an associate of Frank Lloyd Wright, and built in 1948.

The Janes house in Hollywood is a Queen Anne Victorian with elements of Dutch Colonial Revival. It was designed by Oliver Dennis and Lyman Farrell and purchased by the Janes Family in 1903. From 1911 to 1926, the Janes sisters, Carrie Belle, Mabel and Grace, operated the Misses Janes School in the home. The student body included children of early movie industry figures like Cecil B. DeMille, Jesse Lasky, Thomas Ince, Carl Laemmle, Noah Berry and Richard Arlen. The house is still owned by Carrie Janes Collier. Denied monument status in 1972 for architectural significance, it was favored this time for its historic interest.

The El Greco apartments, a Spanish Mediterranean-style building, was built in 1929-30 and modeled after the home of the artist El Greco in Toledo, Spain. The building is on Tiverton Avenue in Westwood.

At the request of Councilwoman Peggy Stevenson, the board deferred action on Peyton Hall until its March 5 meeting, then voted to take under consideration for possible future declaration the Jack London house on La Vista Court in Hollywood.

The board has designated a total of 229 cultural and historical monuments in its 18 years of existence. The oldest

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ATTACHMENT 3

# HERITAGE BOARD

Continued from 16th Page

structure on the CHB list is the Rocha Adobe on Shennadoah Street in West Los Angeles, which was built in 1865 and is owned by a 7th generation Californian. The Avila Adobe is officially the oldest structure in Los Angeles, but located in the city-owned El Pueblo district, it is out of the jurisdiction of the board.

Among the newest structures listed are the Laurelwood apartments and the Pan Pacific Auditorium, both built in the 1940s. Buildings must usually be at least 40 years old to merit consideration by the board.

The designation process begins with a suggestion from a group or individual directly to the board or through a councilmanic office.

Lately, the suggestions have been pouring in, causing a considerable strain on the board which must examine each case.

The trend of converting apartment buildings to condominiums has brought in numerous requests from apartment dwellers hoping that designation of their building as a monument would prevent the conversion.

"Not so," Welch says emphatically.

Essentially, designation delays demolition, removal or any change that would require a building permit. As conversion of an apartment building to a condominium doesn't usually entail a major alteration, designation would not prevent the conversion.

According to Section 3 of the ordinance that established the Cultural Heritage Board in 1962, a historical or cultural monument is "any site, building or structure of particular historic or cultural significance to the city of Los Angeles, such as historic structures or sites in which the broad cultural, political, economic or social history of the nation, state or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state or local history, or which embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period style or method of construction, or a notable work of a master builder, designer or architect whose individual genius influenced his age."

When a building is designated as a monument, notification is sent to the Department of Building and Safety and the address of the site is flagged. If the Department receives an application for a permit to demolish, remove or alter the building at that address, the CHB is contacted. The board has the power to delay the permit for a maximum of one year. The board cannot acquire property for itself or on behalf of the city of Los Angeles, but attempts to find a buyer interested in the preservation of the endangered building during the grace period allowed by delay of the permit.

There are no financial advantages such as tax exempt status for monuments. The disadvantage is for the owner who would like to raze the designated structure to build something more profitable.

In the case of monuments meeting building and safety codes, there is a tendency toward leniency in favor of preservation of the building. Whenever a building presents a hazard to personal safety, however, historical significance would not be a consideration. Usually a compromise is sought.

The main concern now of the board and preservation groups (but not developers) is that old buildings are being torn down faster than they can be identified and evaluated by the board.

A solution to this would be to increase the staff and functions of the Cultural Heritage Board, but more effective would be a block-by-block survey of Los Angeles to identify structures for possible preservation. A plan is in the works for just such a survey, but if approved by the City Council it would take about 10 years to accomplish, according to Welch.

Meanwhile, the conflict between preservationists and developers is likely to continue.

## ***Block by Block***

# Searching for L.A.'s Preservable Past

By SAM HALL KAPLAN, *Times Urban Affairs Critic*

House by house, block by block and neighborhood by neighborhood, Los Angeles is taking stock of the remnants of its history.

About 200 volunteers are methodically combing selected areas in a public and private effort that over the next five years is scheduled to evaluate an estimated 1.5 million structures and sites spread across the city's 468 square miles.

### **Cadre of Volunteers**

The ambitious survey initiated by the city's Cultural Heritage Board is being conducted under the direction of the city's Bureau of Engineering. Assisting is the Los Angeles Conservancy, a nonprofit preservationist group, and a growing cadre of volunteers.

The purpose of the survey is to identify buildings, places and neighborhoods that might qualify for protection as so-called monuments under the city's cultural heritage ordinance, or as landmarks and districts on the National Register of Historic Places, or both.

The survey also will provide the

city with a data bank on buildings and neighborhoods it often needs and seldom has. The data would be used for its own reviews, environmental impact statements and applications for federal funds.

A less tangible benefit—but vital in the neighborhood conservation effort the city now says it is committed to—is the raising of citizen consciousness to the historic treasures surrounding them.

The enthusiasm for discovery certainly seems to be there. In addition to the 200 volunteers who have gone through a training session of four lectures and a field trip to prepare them to take part in the survey, another 200 are waiting in the wings for the next session.

"What we are training is an army of a different type of streetwalkers, alert to the neighborhoods they are surveying and to the charm and value of their own neighborhoods," says Ruthann Lehrer of the Los Angeles Conservancy.

The large turnout has enabled the city to expand its initial survey

**Please see L.A. PAST, Page 11**

## **ATTACHMENT 4**

# L.A. PAST: Looking Block by Block

Continued from 2nd Page

areas this year to include Boyle Heights, Sun Valley, **Hollywood** and sections of South-Central. Most of San Pedro, Echo Park, Venice and the Westlake District already have been surveyed in the effort that began last year.

Working in teams of three and four, the volunteers, representing an array of ages and occupations, examine selected streets following an inventory form. They are aided by a detailed guide featuring an illustrated dictionary of sorts of architectural features. This was prepared by the engineering bureau of the city's Department of Public Works.

Structures of particular interest noted by the teams are then researched in various local archives for such history as when they were designed and built and by whom. The information is compiled and photographs taken, and the material eventually will be presented to a committee of consultant architectural historians,

among others.

After a review and culling, the committee sends its recommendations to the heritage board. A few from there might eventually be forwarded to the Park Service of the federal Department of the Interior for consideration as national landmarks or historic districts.

"The process is really very exciting," says Ara Kasparian of the city's engineering bureau. "We get these little fragments of the past and slowly build a mosaic of the city's history."

Coordinating the survey in the bureau with Kasparian are Alma Carlisle and Daniel Scott. "This is a new role for the bureau, though actually you can consider the preservation of historic structures part of the built environment and therefore a concern of public works," says Scott.

All had particular praise for the volunteers and the training session organized by the conservancy under a modest contract. The survey is being supported in part

by state and federal grants.

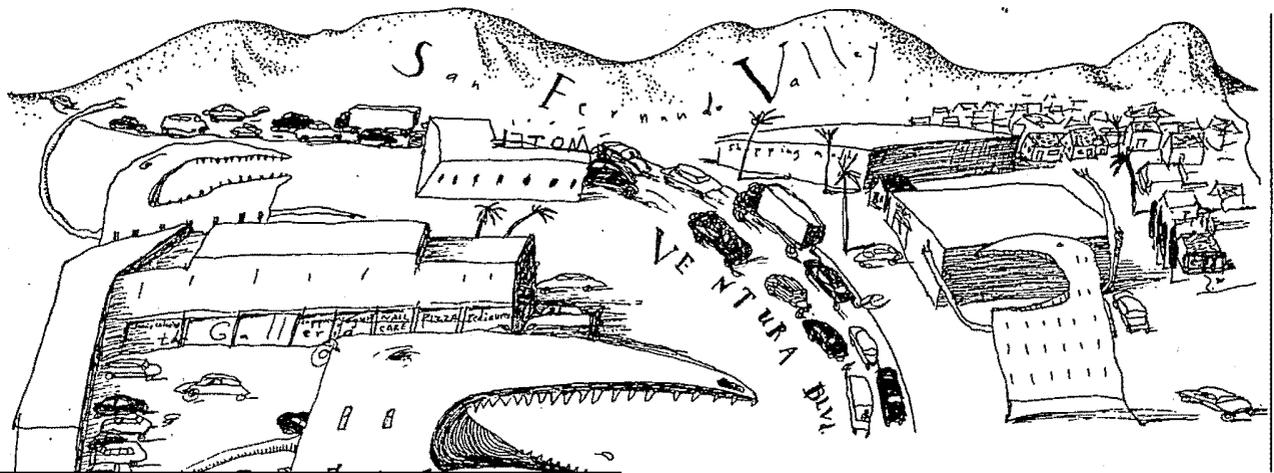
The first 100 recommendations by the volunteer effort are now wending their way out of the review committee in the engineering bureau on City Hall's 8th floor to the heritage board on the 15th floor.

Looking forward to their arrival with some trepidation is Ileana Welch, the board's director. "We are very pleased about the survey, but it is going to keep us very, very busy for a long time," she says. "And these recommendations are just the first."

Welch and a secretary are the only full-time employees of the board, which, with an annual total budget of \$41,000, is part of the city's Cultural Affairs Department. The board itself has five members who are each paid \$10 for attending a meeting about every other week.

Since the board was established under the city's cultural heritage ordinance in 1962, 248 structures and sites have been designated monuments. They range from the Charles Lummis residence in Highland Park and the west facade of the Pan Pacific Auditorium to the Moreton Bay Fig Tree at 1100 National Blvd.

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**THE DARK SIDE OF DEVELOPMENT**

*Without real planning, L.A. borders on chaos*

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**By Mike Davis**

In the dark attic of Los Angeles' past, amid the relics of long-ago water conspiracies, real-estate swindles and the Open Shop, are two particularly troubling and persistent shadows. The first, of course, is the frustrated struggle, dating back to the labor wars of the early 20th Century, to make our police and sheriffs heed the Constitution and its guarantees of freedom of speech and equal protection under law. Here, the Rodney G. King case, Los Angeles' latter-day counterpart to the *L'affaire Dreyfus*, has forced a reluctant city to acknowledge aspects of a guilty history.

Yet Los Angeles should be equally concerned about the skeletons rattling around in the closets of the Department of Planning. Indeed, to use a *notre* metaphor, the venalities of planning have tended to play the "Two Jakes" to police abuse's "Chinatown." Consider the sobering examples of the city's two major historical attempts to impose a coherent design on runaway urbanization.

The first was in 1945, just a month before Hiroshima. Planners foresaw that V-J Day would bring a huge land rush of developers and house-hunting ex-GIs to the still-agricultural San Fernando Valley. The president of the city planning commission, respected architect and public-housing advocate Robert E. Alexander, believed it was urgent to prevent suburbanization from completely destroying the Valley's rural character.

The comprehensive zoning ordinance adopted in July, 1945—and ratified by the City Council in early 1946—therefore proposed to concentrate postwar growth in compact master-planned "garden cities," separated by agricultural greenbelts that preserved farms and orchards. If implemented as intended, Alexander's idyllic plan would have allowed the Valley—with a land area equal to Chicago's—to absorb several hundred thousand new families while ensuring that their children—and, indeed, their children's children—could still smell alfalfa in the fields and play hide and seek in orange groves.

Developers, however, immediately recognized that the plan could be subverted to their enormous profit. Buying up the cheapest agriculture-zoned property, they exploited the hysteria of the housing crisis to get it rezoned as more valuable residential land. As Alexander recalled in a memoir, the developers would appear at City Hall "accompanied by a veteran wearing an American Legion hat," ready to denounce opponents of rezoning as "communists."

Although Alexander stood firm—"I did not become president to preside over the dissolution of the Valley"—the rest of the planning commission capitulated to "patriotic pressure." Like a colony of termites devouring a log, the developers used exemptions as sharp teeth to whittle away the zoning ordinance. By 1960, as a result, the proposed greenbelts had become dense housing tracts and the rural Valley was lost forever.

The second and more recent case is, of course, Proposition U. Five years ago this November, Angelenos voted overwhelmingly to cut developable commercial density in most of the city by half. Outraged by skyscrapers in their front yards and torrents of commuter traffic on their streets, neighborhoods from Westchester to Lincoln Heights rose in revolt. Despite warnings that Prop. U ("Initiative for Reasonable Limits") would kill the boom and further polarize the city between haves and have-nots, a 70% majority, including most Chicano and black homeowners, approved slamming the breaks on commercial overdevelopment.

What has been the result? As Councilman Zev Yaroslavsky—the initiative's original co-sponsor—argued in a recent interview, it is probably true that Prop. U has helped tame high-rise strip development and forestalled the destruction of the boutique renaissance. Please see PLANNING, M6

*Mike Davis is the author of "City of Quartz: Excavating the Future of Los Angeles" (Routledge, Chapman & Hall).*

BLAIR THORNLEY / for The Times

**ATTACHMENT 5**

# Planning

Continued from M1

on Melrose and La Brea boulevards. It also mobilized the grass-roots pressure that forced reluctant city officials to approve new controls on minimalls, a landmark parking-conformity ordinance and a growth-moderating "specific plan" for Ventura Boulevard.

On the other hand, Prop. U—like Alexander's Valley greenbelt plan before it—has become so much Swiss cheese, as its restrictions are nibbled away by exemptive maneuvers. Not surprisingly, this is fine with most council members, who relish their power to broker the dilution of Prop. U—justified, predictably, as "negotiating amenities" for the community.

Moreover, Prop. U applies only to existing commercial zoning outside the biggest high-rise centers. It provides no relief against the blobs currently invading Hollywood and the Miracle Mile. Nor does it provide any mechanism to translate commercial downzoning into encouragement for affordable, medium-density residences that the city so desperately needs.

Prop. U has also failed as a catalyst of political realignment. Councilwoman Ruth Galanter, who used Prop. U to topple the mighty Pat Russell, has disappointed expectations that she would become the citywide tribune of growth control. At the same time, the neighborhood ground swell behind Prop. U has largely subsided into the selfish parochialism of homeowner associations, insensitive to the housing crisis in the rest of the city.

At City Hall, meanwhile, faith in comprehensive planning seems near collapse. Explaining why Galanter has abdicated a larger leadership role, one of her chief

deputies argued, "Los Angeles is simply not amenable to citywide policies or solutions." The mayor's planning deputy, Jane Blumenfeld, warned that the city had fallen 10 years behind in land-use planning for its new Metro Rail system, and even further in the provision of new affordable housing.

For his part, Yaroslavsky was predictably colorful: "Los Angeles makes the U.S.S.R.'s problems look simple. Like the Soviets' dying empire, we also have secessionist republics, a collapsing center and vacillating leadership. We need an overhaul every bit as sweeping as Russia's."

But what kind of overhaul? Surprisingly, both Yaroslavsky and his occasional antagonist, Deputy Mayor Mark Fabiani, express last-ditch hope in the appointment of a superplanner—a "gutsy, butt-kicking" (Yaroslavsky), "fearless and independent" (Fabiani) director of planning to rescue that agency from total demoralization. Yaroslavsky insists the current search for a successor to Kenneth C. Topping "is every bit as important as finding a replacement for Chief Daryl Gates. Landscaping may not seem as significant as chokeholds, but a mediocre police chief is not as dangerous to the city as another mediocre planning director."

Be that as it may, it is still difficult to imagine that the Moldovians in Eagle Rock and the Uzebeckis in Tarzana—not to mention the developers and their lobbyists in City Hall—won't eat alive any planning director ever made. The implacable history lesson that Prop. U seems to reinforce is that the micropolitics of planning—that is to say, the incessant erosion of general principles by special-interest pressures—is antipathetic to both vision and democracy. As Jake Gittes learned the hard way, that's simply how it has always been in "Chinatown." □

PLEASE SEE:

- 2016, Apr 2 LA Times: Tearing down to drive up prices; **More rent-controlled buildings are being demolished in favor of costlier housing...**  
"More than 1,000 rent-controlled apartments were taken off the market last year (i.e., demolished) -- a nearly threefold increase since 2013. Evictions from such units have doubled over the same time. More than 20,000 rent-controlled units have been taken off the market since 2001."
- 1998, Oct 25 LA Times: "A Public-Housing Policy That Says Fewer Units Is More"
- 1990, May 1 LA Times: Panel Urges Run-Down Housing Be Renovated "Operation Rebuild". "It's much cheaper to rehabilitate a house than to tear it down and start all over.. **The goal is to not deplete the available stock of affordable housing in Los Angeles.**"

PLEASE SEE THESE ARTICLES:

- 1945, Nov 7, LA Times: Supervisors Act on **Crisis in Housing**
- 1946, Feb 23, LA Times: The **Housing Crisis**
- 1946, Mar 26, LA Times: **Housing Crisis** Delays Hollywood Freeway
- 1952, Mar 17, LA Times: **Housing Crisis** Still On, Mayor Tells Veterans
- 1967, Jul 30, LA Times: '68 **Housing Shortage** Seen in Area
- 1969, Jun 7, LA Times: Cooperation Urged to Meet **Housing Needs...**
- 1970, Jan 12, LA Times: Suffering its **worst housing shortage**
- 1972, Jan 13, LA Times: **Housing Shortage**
- 1973, Mar 29, LA Times: Group to Study L.A. **Housing Crisis**
- 1974, Aug 18, LA Times: ..**severe housing shortage** in next few months
- 1974, Oct 4, LA Times: ..need for more low and moderate income housing

- 1976, Sep 16, LA Times: We are facing a **housing crisis**
- 1977, Oct 22, LA Times: **Housing Crisis** in County Seen by '87
- 1978, Apr 4, LA Times: Saying the city has a **housing crisis**...
- 1979, Oct 28, LA Times: ...long-term solutions to the **housing shortage**
- 1979, Oct 28, LA Times: **Housing Shortage**: The Ultimate Myth?
- 1979, Nov 11, LA Times: ... proposed project will contribute significantly to a rental **housing shortage**..
- 1979, Nov 30, LA Times: Meeting on **Housing Shortage**
- 1979, Nov 30, LA Times: LA area is currently facing a **housing crisis**
- 1979, Dec 27, LA Times: Worsening **housing shortage**
- 1980, Feb 18, LA Times: ...the city's worst **housing crisis** ever...
- 1980, Apr 6, LA Times: Added Density Studied to Ease **Housing Crisis**
- 1980, Jun 19, LA Times: ...because of the local **housing crisis**
- 1982, Apr 4, LA Times: the acute **housing shortage** existed years...
- 1985, Jan 27, LA Times: "in the light of the **housing crisis** in the city,"
- 1985, Feb 28, LA Times: ...the **housing crisis**
- 1987, Oct 4, LA Times: Los Angeles faces a severe **housing crisis**
- 1988, Nov 27, LA Times: ..builders are alarmed by the **housing crisis**
- 1989, Apr 20, LA Times: Correcting a **Housing Crisis**
- 1990, Jul 10, LA Times: Vacancies Amid an **Apartment Shortage**
- 1990, Jul 27, LA Times: Los Angeles destroying usable dwellings amid a severe **housing shortage**
- 1990, Oct 7, LA Times: ...**wiped out low-income housing** and contributed to homelessness.

- 1991, Oct 13, LA Times: ...resolve the **housing shortage**
- 1992, Feb 13, LA Times: ...relieve a horrific **housing shortage** in LA
- 2000, Apr 25, LA Times: New Development Trend an Answer to **Housing Crisis**
- 2006, May 21, LA Times: LA has a **severe shortage** of affordable housing
- 2007, Sep 28, LA Times: ...wound up with a **housing shortage**
- 2020, Mar 6, LA Times: Los Angeles facing a **housing crisis**

#### REFERENCES:

- Baker, Hannah, Moncaster, Alice, Remøy, Hilde & Wilkinson, Sara (2021). *Retention not demolition: how heritage thinking can inform carbon reduction*, Journal of Architectural Conservation, DOI: 10.1080/13556207.2021.1948239
- Berghauser Pont, M., Haupt, P., Berg, P., Alstæde, V., & Heyman, A. (2021). *Systematic review and comparison of densification effects and planning motivations*. Buildings and Cities, 2(1), 378–401. DOI: doi.org/10.5334/bc.125
- Carreón, Jesús Rosales, Whorl, Ernst (2017). *Urban energy systems within the transition to sustainable development. A research agenda for urban metabolism*. Department of Innovation, Environmental and Energy Sciences, Copernicus Institute of Sustainable Development, Utrecht University
- Conejos, Sheila, Langston, Craig Ashley, Smith, Jim (2021). *Designing for future building: Adaptive reuse as a strategy for carbon neutral cities*. The International Journal of Climate Change: Impacts and Responses
- EPA (2020). United States Environmental Protection Agency, Office of Land and Emergency Management. *Advancing Sustainable Materials Management: 2018 Fact Sheet*
- GARCIA, DAVID, KWON, ELLIOT (2021). *Adaptive Reuse Challenges and Opportunities in California*. A TERNER CENTER REPORT. UC BERKELEY
- Garthwaite, Josie (2021). *Methane and climate change*. Stanford Earth Matters magazine
- Heaviside, Clare, Macintyre, Helen, Vardoulakis, Sotiris (2017). *The Urban Heat Island: Implications for Health in a Changing Environment*. Current environmental health reports. 4. 10.1007/s40572-017-0150-3.
- Lehne, Johanna, Preston, Felix (2018). *Making Concrete Change: Innovation in Low-carbon Cement and Concrete*. chathamhouse.org/2018/06/making-concrete-change-innovation-low-carbon-cement-and-concrete
- Los Angeles Times (1904, Jun 28). *TO PRESERVE SHADE TREES.: COUNCIL TAKES ACTION TO HEAD OFF THE CURBS*

## Communication from Public

**Name:** Hollywood Media District, BID  
**Date Submitted:** 04/22/2023 05:06 PM  
**Council File No:** 21-0934  
**Comments for Public Posting:** Please find attached a comment letter with exhibits from the Hollywood Media District BID.



April 21, 2023

Hugo Soto-Martinez, LA City Councilmember District 13  
Emma Howard, Community Development & Planning Director  
200 N. Spring St., Room 480  
Los Angeles, CA 90012

RE: Hollywood Community Plan Update Adoption  
CPC-2016-1450-CPU  
ENV-2016-1451-EIR  
SCH No. 2016041093

Dear Ms. Howard:

I am writing on behalf of the Hollywood Media Business Improvement District (the "BID") regarding the above referenced Hollywood Community Plan Update ("HCPU2"). The members of our PLUM committee raised some of these issues in our meeting with you last week.

The BID submitted comment letters on January 31, 2019 ("First Comment Letter") and December 16, 2019 ("Second Comment Letter") in response to the HCPU2 and associated Draft Environmental Impact Report ("DEIR"). Both comment letters provided critical information about the uses of properties and businesses in the BID that shaped the HCPU2 for the BID area. See letters Exhibits A and B. There have been no public objections to the changes proposed by the BID and incorporated into the HCPU2.

The BID wishes to express its support for the adoption of the HCPU2 with a critical modification to remove the proposed Q condition that will prohibit residential development, including hotel uses and joint living / work quarters, within targeted areas proposed for industrial and commercial uses. As currently proposed in the plan, subareas with a land use designation of Limited Industrial (including 39:4, 40, 40:1B, 40:2) would change to [Q] M1-2D and [Q] M1-2D-SN. Without the Q condition, the proposed M1 zone would still require developers to obtain entitlements such as a zone change in order to develop mixed-use buildings with a residential component. However, including the Q condition would restrict any kind of future residential development throughout the Hollywood Media District, even through an entitlement procedure. The BID previously advocated in the above referenced comment letters and maintains that the flexibility to permit future residential development is vital because:

1. More housing is critically needed in Hollywood in response to the City's extreme housing crisis and rising unhoused population.

2. The Hollywood Media District is located in a key transit corridor served by the Metro Rapid Bus with three stops on Santa Monica Boulevard at Vine Street, Highland Avenue, and La Brea Avenue.
3. The Hollywood Media District is a well-known jobs center for studio and media-related uses and emerging creative office space. Logical urban planning should allow the development of multi-family residential uses in areas with substantial jobs and transit opportunities to shorten vehicle miles traveled, encourage walking, and improve the jobs-to-housing balance.

Preserving a significant portion of Hollywood for industrial uses only is an antiquated urban planning practice. The city should allow the district to maintain and even strengthen its legacy as a jobs center for media related industries while also allowing flexibility for future development of residential uses in order to satisfy an unprecedented demand, easing the housing crisis and supporting the business uses of properties in the BID. The result will undoubtedly be a healthier community where people can live close to where they work, walk to neighborhood serving retail and restaurants, and access public transit options. In the upcoming PLUM and City Council Hearings to adopt the HCPU2, we strongly encourage you to advocate for removal of the Q condition that prohibits residential development in the Hollywood Media District.

Sincerely,



Miguel Padilla  
President, Board of Directors  
Hollywood Media District BID

# EXHIBIT A

January 31, 2019

File Number: 56FW-270531

## VIA HAND DELIVERY AND E-MAIL

Ms. Linda Lou  
City Planner  
City of Los Angeles  
Department of City Planning  
200 N. Spring Street  
Room 667, Mail Stop 395  
Los Angeles, CA 90012  
E-Mail: linda.lou@lacity.org

Re: Comments on the Hollywood Community Plan Update (CPC-2016-1450-CPU) and the Draft Environmental Impact Report (ENV-2016-1451-EIR, SCH No. 2016041093)

Dear Ms. Lou:

We represent the Hollywood Media District Business Improvement District ("HMD BID"). As a key stakeholder in Hollywood, the HMD BID provides the following comments on the draft Hollywood Community Plan Update ("HCPU2") and the associated Draft Environmental Impact Report ("DEIR"), released by the City of Los Angeles ("City") for public review in November 2018.

The area of the HMD BID is bounded by Fountain Avenue to the North, Vine Street to the East, Melrose Avenue to the South, and La Brea Avenue to the West (See Attachment A, Map of HMD BID Boundary). The HMD BID has a robust organizational structure with a diverse group of stakeholders, multiple committees and board members who are actively engaged in matters related to the HMD BID area including land use, marketing, safety, arts, and environmental sustainability. The HMD BID is currently led by David M. Bass, President; Laurie Goldman, Immediate Past President; and Alfredo A. Hernandez, Executive Director.

The HCPU2 repeatedly refers to the HMD BID as an "industrial area" that is at the center of media and entertainment-related uses and limits its potential to a "Industry Retention Area." (See HCPU2, p. 2-2, 2-8, also see Figure 3-3). However, this does not accurately capture the current reality nor the enormous potential of the HMD BID to positively contribute to the future of Hollywood. In fact, the HMD BID is developing into the epicenter of innovation for media and tech. Creative offices are being created and designed to inspire and support the creative talents of tomorrow. The HMD BID is at the heart of an important synergy taking place between the next generation workplace – workplaces that delight, inspire, refresh and advance the creativity of those who work there – and the HMD BID's principles of imagination, community, and expansiveness. Thus, we propose a revised definition of the HMD BID as discussed further to

acknowledge the new types of uses in the area (e.g., “new media”, art and interior galleries) and seamlessly integrate the preservation of industrial uses for job creation with complementary residential and commercial uses.

Based on the land use and zoning proposed in the HCPU2, the HMD BID recommends the City increase the by-right FAR and allow residential uses (including hotel) in the HMD BID area. This letter provides specific recommendations for individual subareas within the HMD BID. The proposed changes will not only allow the HMD BID to act as the center for industrial uses and jobs but also promote the HCPU2’s vision to enable residents and visitors to live, work, play and shop in Hollywood. (HCPU2, p. 3-2). We thank the City for this opportunity to comment.

## **I. Overview of HMD BID Area**

The HMD BID brings together approximately **350** unique property owners and over **400** businesses to enhance the security, cleanliness, beautification and commercial desirability of the area. The area consists of a diverse range of uses including theatres/entertainment, media-related studio uses, creative office space, live/work and residential units, as well as restaurant and retail uses. The periphery of the HMD BID includes commercially-zoned properties with an array of mixed-use developments.

More recently, the HMD BID has seen a growing interest in developing complementary commercial and residential uses to enhance the traditional entertainment and studio uses. As such, this letter proposes changes to the draft HCPU2 for the HMD BID to accommodate these complementary uses and increase FAR for the HMD BID to contribute to the overall goals and projected growth of the HCPU2.

## **II. HCPU2 Vision for HMD BID Area**

### **a. Proposed Uses**

The HCPU2 refers to the HMD BID as one of the key clusters of “low-intensity industrial uses” and as “the center of pre- and post- production, such as set construction, still photography, film and tape editing, film archiving and storage, studio equipment manufacture, rental and storage, sound recording, film projection and screening, prop houses, lumber yards, rehearsal and broadcast studios and production offices.” (HCPU2, p. 2-8). The HCPU2 seeks to “preserve” the industrial uses of the Media District and the theatres of Theatre Row, while allowing a mixture of uses along the edges of the District on La Brea Avenue and Santa Monica Boulevard. (HCPU2, p. 2-2). The HMD BID Area is proposed to include the following twenty-three subareas: 16, 17:1, 17:2, 17:3, 17:4, 19, 19:1, 39:1, 39:3, 39:4, 40, 40:1, 40:1A, 40:1B, 40:1C, 40:2, 40:2B, 40:2C, 40:3, 40:4, 40:4A, 40:5, and 40:6. (See Attachment B, Map of Proposed Subareas for HMD BID).

### **b. Suggested Revisions**

While the HMD BID does include traditional entertainment-related studio and industrial uses, the HCPU2 does not accurately capture the existing uses or the potential of this area to become a

vibrant destination for the City of Los Angeles. Rather, the City's approach will likely stunt the growth in this area. The HMD BID has been working with stakeholders over the last year to develop a vision for the future development of the area. Stakeholders have considered how to thoughtfully incorporate the emergence of new media, commercial and residential uses while balancing the need to sustain this area as a hub for jobs in the entertainment business. For example, the HMD BID developed the Hollywood Media District Presents Hollywood Greens. (See Attachment D). This booklet provides a snapshot of the HMD BID's vision for the area as a walkable, safe, comfortable, sustainable, green, connected and open space.

The emergence of new media, interior design and art galleries are some of the uses within the HMD BID area that call into question the definition and description of the HMD BID within the HCPU 2. The HMD BID is referred to repeatedly as an industrial area that is at the center of media and entertainment-related uses along with the "flourishing equity-waiver theater district, known as Theatre Row." The HCPU2 also refers to a large portion of the HMD BID as a "Industry Retention Area." (HCPU2, p. 2-2, 2-8, also see Figure 3-3).

Examples of these new media uses within the HMD BID include SiriusXM (953 Sycamore) and BuzzFeed (1135 N Highland). Tenants of these new media uses look for modernized campuses with commercial and residential uses to complement job creation. Put differently, new media businesses want a placemaking site for their employees to live, work, and play. Thus, the proposed Industrial designation and prohibition on residential uses for the HMD BID area are not aligned with the emerging model for new media uses. Providing opportunity for residential uses, additional density and FAR in the HMD BID can add more value to the HCPU2's primary objectives to (1) encourage a better balance of jobs and housing with mixed-use development; and (2) accommodate commercial uses for future employment opportunities. (DEIR, p. 3-13).

In addition to these new media uses, the HMD BID has significantly changed in the last ten years, with the conversion of underutilized and vacant industrial uses into new mixed-use development. Examples include 6677 West Santa Monica Boulevard (Case No. CPC-2006-9797-GPA-VZC-HD-CU-SPR-DB) and 1625 N. Schrader Boulevard (Case No. CPC-2016-1083-GPA-VZC-HD-DB-SPR). The City approved these projects with land use and zone changes from manufacturing use to commercial. The HCPU2 acknowledges these types of new developments and continued increase in employment opportunities. (HCPU2, p. 2-11). Similar mixed-use developments have emerged in nearby West Hollywood, which borders the HMD BID and include both residential and ground-floor commercial to support the surrounding employees and visitors.

The HMD BID has also seen the introduction and expansion of art gallery and interior design uses. Some examples include the Kohn Gallery (1227 N. Highland), Gavlak (1034 N. Highland), JF Chen (1000 N. Highland), Regen Projects (6750 Santa Monica Boulevard), and LAXART (7000 Santa Monica Boulevard). These uses continue to enhance the vibrancy of the HMD BID as a prime location for entrepreneurs and a diverse range of artists to work, create and share their ideas. The combination of new media and art gallery spaces further establish the need for the presence of residential uses and hotels. These new uses stimulate a market of local and international travelers who will arrive and stay in the area. Thus, hotel and related

commercial and retail uses are necessary to meet the needs of the growing uses and influx of visitors and possible future residents into the HMD BID.

We propose the City modify the existing description of the HMD BID to reflect the incoming new media uses, art gallery and interior design spaces, and a desire to seamlessly integrate the preservation of industrial uses for job creation with complementary residential and commercial uses. This modification will serve to enhance the vitality of the HMD BID area and promote the HCPU2's overall goal to develop the Hollywood Community Plan Area as a live, work, play destination. Further, we propose the modification of Goal LU8.4 and Program Number 17 to align with this proposed revision to the definition. (HCPU2, p. 3-20, p. 7-6).

These projects represent the desired uses of the HMD BID and demonstrate how services such as hotels, residences, shops and restaurants can complement the studio uses to increase overall vitality and growth for the Hollywood Community Plan Area. As discussed in greater detail below, the HMD BID seeks zoning that permits greater FAR and allows residential uses (including hotels). (See Attachment C, Map of Proposed FAR in HMD BID).

### III. Land Use

#### A. Subarea 40:1B

*Proposed Zoning:* [Q] M1-1-SN

- No residential development permitted, including artist-in-residence or live-work.
- MR-1 uses only along Santa Monica Boulevard between McCadden Place and Lillian Way.
- FAR 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Allow for M1 uses along Santa Monica Boulevard, between McCadden Place and Lillian Way.
- Increase FAR to 4.5:1.

*Assessment/Rationale:*

The City proposes Subarea 40:1B to be designated "Limited Industrial" to "retain/preserve industrial land for jobs." Subarea 40:1B consists of a large portion of parcels from Lillian Way to the East, Citrus Avenue to the West, Santa Monica Boulevard to the North and Warring Avenue to the South. Like other subareas in the HMD BID, this Subarea has traditionally been a focal point for a variety of media-related and industrial uses intended for job creation.

This Subarea includes studio and media-related uses such as the Hollywood Production Center, Sunset Las Palmas Studios, Siren Studios, Red Studios, and Eastman Kodak Company. However, these uses are physically enclosed with no street-facing openings for pedestrian access, not built out to maximum intensities, and do little to contribute to what could otherwise be a vibrant pedestrian district.

The Subarea also includes Theatre Row with renowned theatres such as Harris and Rubble, Blank Theatre Company, and Hudson Theatres. While it is important to preserve the architecture and theatres, the uses are similarly enclosed, underutilized, and do not promote active street frontages and a lively pedestrian experience. Thus, while the media and theatre uses provide jobs and serve as an economic driver for the larger Hollywood Community Plan Area, they do not promote employees or visitors to live and/or engage in other activities within the HMD BID.

In addition, the introduction of new media businesses into the HMD BID (e.g., Buzz Feed and Sirius XM) displays a shift in the desired mix of uses necessary to stimulate productivity and growth. For instance, the recent entitlement request for Sirius XM's new proposed office space (Case No. ZA-2017-2814-CU-CUB) includes a request for a restaurant use. The design features also provide a stark contrast to the surrounding studio spaces and consist of an open floor plan, long glass windows for natural light, and an aesthetically pleasing façade to activate the street below.

This is how the HMD BID envisions the future design and surrounding context of the area. These desires and possibilities for open streets that are pedestrian-oriented and activate the corridors throughout the HMD BID are further illustrated in Hollywood Media District Presents Hollywood Greens ([Attachment D](#)). This vision discusses the potential to attract more visitors and create pockets of welcoming, pedestrian-friendly areas that include green landscapes with plenty of trees, street furniture, and walkable sidewalks. The building design that Sirius XM brings to the HMD BID is a step in this direction and if combined with the additional proposals discussed below can enhance the vibrancy and maximize the potential of this area.

However, simply changing the surrounding zones from MR-1 to M-1 and allowing commercial uses (e.g., restaurant and retail) by-right is not enough to encourage more of these new media uses to come to the HMD BID. Rather, complementary residential uses such as joint-live work and multi-family development will create a built-in network of residents to support the growth of jobs and commercial uses of the HMD BID. Per the Projected Conditions of 2040 Plan, the "Industrial/Mix Subregion" which largely encompasses the HMD BID is expected to absorb the largest employment growth rate of all the other regions at 11% (DEIR, Appendix J, Hollywood Community Plan Model Development Report p. 14). This Subregion is also anticipated to have the second largest population growth percentage after the Regional and Corridor Subregion (directly to the North of the HMD BID) at 36% (DEIR, Appendix J, Hollywood Community Plan Model Development Report p. 14). This will not be feasible with the proposed Q Conditions for this Subarea.

The DEIR states: "The Proposed Plan does not propose any changes to land use designation, zoning, or policies that would promote or support the construction of any barriers that would

physically divide or separate any neighborhood from another in the Project Area.” (DEIR, p. 4.10-16). However, the Industrial designation and M-1 zoning of this particular Subarea isolate it from the commercial corridors proposed at the periphery of the BID (i.e., north of Santa Monica Boulevard, east of Vine Street). The proposed land use along these peripheries is General Commercial and Community Commercial. The permitted uses along these major arterials include residential and commercial uses, isolating the parcels directly across the street that are a part of the HMD BID. In order to create a vibrant district with complementary uses on both sides of the street, the proposed Q Conditions for this Subarea will need to be changed as requested.

Additionally, to support and maximize the desired new uses for the HMD BID and increase the proposed job and household growth, an increase in FAR is greatly needed. At present, the City is proposing no change to the current permissible FAR of 1.5:1. However, this limited FAR is insufficient to promote growth as the existing industrial uses are largely underdeveloped and underutilized. If the current FAR is not increased to complement the commercial uses north of Santa Monica Boulevard in Subarea 40:1B, it will fall behind and be unable to achieve the HCPU2’s vision for job growth in the area.

## **B. Subarea 40**

*Proposed Zoning:* [Q] M1-1

- No residential development permitted, including artist-in-residence or live-work.
- FAR 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Increase FAR to 4.5:1.

*Assessment/Rationale:*

Like Subarea 40:1B, the HCPU2 proposes the “Limited Industrial” designation for Subarea 40 to “retain/preserve industrial land for jobs.” Subarea 40 consists of a large portion of parcels within the HMD BID between Santa Monica Boulevard to the North, Highland Avenue to the East, La Brea Avenue to the West, and Willoughby Avenue to the South. This Subarea has a variety of media-related and industrial uses such as the Hollywood Casting and Film Studios, Mandt Media, and Siren Studios.

These uses (while important) are closed off from the street and not built out to maximum intensities. As a forward-looking document, the HCPU2 should accommodate the changing conditions of the HMD BID area and allow for new media uses, increased FAR and residential uses to encourage economic development of the area. Currently, the City proposes no change

to the existing FAR of 1.5:1. However, this is not enough to continue to maintain existing industrial growth as well as future projected growth for the HMD BID area.

## **C. Subareas 40:1C and 40:2**

*Proposed Zoning:* [Q] M1-1

- No residential development permitted, including artist-in-residence or live-work.
- FAR 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Increase FAR to 4.5:1.

*Assessment/Rationale:*

Like other areas in the HMD BID, the City proposes a “Limited Industrial” designation for Subareas 40:1C and 40:2 to “retain/preserve industrial land for jobs.”

Subarea 40:1C fronts Willoughby Avenue and encompasses the parcels directly north of Willoughby Avenue between Citrus Avenue and continues until before La Brea Avenue. The proposed zoning is inconsistent with the existing conditions of these parcels which are largely multi-family residential with limited media-related uses scattered in between. Furthermore, new mixed-use development projects are underway immediately adjacent to this Subarea on La Brea Avenue. For example, the approved 7-story mixed-use development at 900 N. La Brea Avenue includes 169 dwelling units and approximately 37,000 SF of ground-floor retail (Case No. CPC-2014-4074-SPA-ZC-HD-ZAA-SPR). Despite existing conditions and future projects, the City seeks to prohibit residential uses in this Subarea. The HMD BID requests the City allow residential uses alongside industrial and commercial uses to further activate this Subarea and the surrounding residential uses.

Similarly, Subarea 40:2 is currently developed with creative office spaces and parking and is between Romaine Street to the North, Barton Street to the South and N Las Palmas Avenue to the West. The parcels directly south of Barton Street are developed with residential uses. Hence, the proposed Q Condition prohibiting residential uses is not consistent with parcels across the street from this Subarea. In fact, allowing for residential uses as a future use can bring together the area as a cohesive whole and provide much-needed housing to support the existing jobs. Subarea 40:2 also includes parcels along Seward Street that primarily include a restaurant, studios, and parking uses. This area is largely underdeveloped and could benefit from an expansion of permitted uses.

Currently, the City proposes no change to the existing FAR of 1.5:1 for Subareas 40:1C and 40:2. The existing FAR is not sufficient to continue to maintain existing industrial growth as well as expect future growth for the HMD BID area.

## **D. Subarea 40:1**

*Proposed Zoning:* [Q] C2-1VL-SN

- No residential development permitted, including artist-in-residence or live-work.
- FAR 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Increase FAR to 4.5:1.
- Increase FAR to 4.5:1 for the following properties: 848 N. Citrus Avenue and 856 N. Citrus Avenue.

*Assessment/Rationale:*

Subarea 40:1 is proposed to be designated “Commercial Manufacturing” to “retain/preserve industrial land for jobs.” Existing conditions are largely commercial in nature with various office spaces and storefronts concentrated on Highland Avenue between Willoughby Avenue and Melrose Avenue. However, there are recently developed and future residential uses in the pipeline. These projects include an affordable housing project proposed at the intersection of Melrose Avenue and Highland Avenue filed on October 5, 2018 (Case No. PAR-2018-5795-TOC). There is also an existing 27-unit live work project already developed at 717 N. Highland Avenue developed in 2005 (Case No. VTT-61795). Hence, proposing a Q Condition to prohibit residential development is inconsistent with the existing and desired uses for this Subarea.

Like the other subareas in the HMD BID area, the City proposes no change to the existing FAR of 1.5:1. This limited FAR is not forward looking and does not provide the HMD BID area with the ability to become a driver of jobs and the economy of the area, as expected in the HCPU2. The existing residential development along Highland Avenue suggests the potential for an increase in FAR to further facilitate this development in conjunction with industrial and commercial uses that facilitate job creation.

Additionally, the properties along Citrus Avenue are adjacent to proposed Subareas within the HMD BID. In order to accommodate the future intensity of uses in the area, it is essential for these properties to obtain a higher FAR. While these properties are directly outside the HMD BID boundary, the FAR will directly impact the desired growth of the areas within and around the HMD BID. Therefore, in order to seamlessly integrate future uses and encourage complementary uses at the same scale, these properties are also proposed to have an FAR of

4.5:1. Please note that we are not asking the City to include these properties in Subarea 40:1, as the zoning already permits residential and commercial uses.

## **E. Subareas 40:3, 40:4, and 40:4A**

*Proposed Zoning:* Subareas 40:3 and 40:4A, [Q] CM-1VL; Subarea 40:4: [Q] CM-1VL-SN

- No residential development permitted, including artist-in-residence or live-work.
- FAR 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Increase FAR to 4.5:1.

*Assessment/Ratio nale:*

Subareas 40:3, 40:4 and 40:4A are proposed to be designated “Commercial Manufacturing” to “retain/preserve industrial land for jobs.” These Subareas largely consist of existing commercial and industrial uses, but also have scattered residential uses throughout the area. Thus, in order to facilitate the creation of future residential uses and the ability for residents, patrons and employees of the HMD BID to live, work and play in the area, the proposed Q Condition should be removed. This request seems particularly reasonable given the fact that the parcels directly south of Subarea 40:4A are zoned residential. While these parcels are not a part of the BID, these developments would be further complemented if surrounding areas were permitted to also pursue residential, commercial and industrial uses.

Like the other subareas, the City proposes no change to the existing FAR of 1.5:1. However, this is not sufficient to continue to maintain existing industrial and residential growth as well as future projected growth for the HMD BID area.

## **F. Subareas 40:2C**

*Proposed Zoning:* [Q] MR1- 1VL

- No residential development permitted, including artist-in-residence or live-work.
- FAR 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Increase FAR to 4.5:1.

*Assessment/Rationale:*

Subarea 40:2C is proposed to be designated “Limited Industrial” to “retain/preserve industrial land for jobs.” Subarea 40:2C largely consists of existing commercial and industrial uses, but also has scattered residential uses within the area. Thus, as discussed above, to facilitate the creation of future residential uses and continued economic growth in the HMD BID area, the proposed Q Condition should be removed.

Currently, the City proposes no change to the existing FAR of 1.5:1. However, as mentioned, this is not enough to continue to maintain existing industrial and residential growth as well as future projected growth for the HMD BID area.

**G. Subarea 40:6**

*Proposed Zoning:* [Q] C2-2D

- No residential development permitted.
- FAR 3:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Modify subdivision 1 of the D Limitation to increase FAR to 4.5:1.

*Assessment/Rationale:*

Subarea 40:6 is proposed to be designated “Limited Industrial” to “retain/preserve industrial land for jobs.” However, this designation is inconsistent with the proposed zoning as C2. Thus, we request the City to change the land use designation to “Community Commercial” in order to maintain consistency with the underlying zoning and to match the proposed use being proposed across the street for Subarea 40:5.

Existing uses include a historic-cultural monument (“HCM”) for the Musicians Union of Hollywood (CHC-2017-4331-HCM) and an ongoing construction of creative office space and parking adjacent to the HCM. The opportunity to develop residential uses in this Subarea at a greater FAR could add additional value to the already proposed development. While the City proposes an increase in FAR to 3:1 from the existing 1.5:1, this is not a sufficient increase to support the current and projected growth of the area.

Thus, in order to maintain consistency with the existing conditions and immediately surrounding projects, the proposed change to this Subarea includes: (a) removal of Q Condition 1 which prohibits residential development to allow for residential development including artist-in-

residence, live-work conversion, multi-family residential developments and hotels; (b) increase FAR to 4.5:1; and (c) change the land use designation to “Community Commercial.”

## H. Subareas 17:1 and 17:3

*Proposed Zoning:* Subarea 17:1, [Q]C2-2D-SN; Subarea 17:3, [Q]CM-2D-SN

- No 100% residential development permitted.
- Residential uses shall only be permitted with 0.7:1 FAR dedicated to targeted media related uses.
- FAR 3:1 (with 0.7 FAR for targeted media related industrial uses) otherwise 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit 100% residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Modify subdivision 1 of the D Limitation to increase FAR to 4.5:1.
- Expand boundary of Subarea 17:1 to include 1125 N. McCadden Place, 1119 N. McCadden Place, 1145 – 1155 N. McCadden Place, 6762 Lexington Avenue, 6769 Lexington Avenue, 1136 N. Highland Avenue and 1204 N. Highland Avenue.

*Assessment/Rationale:*

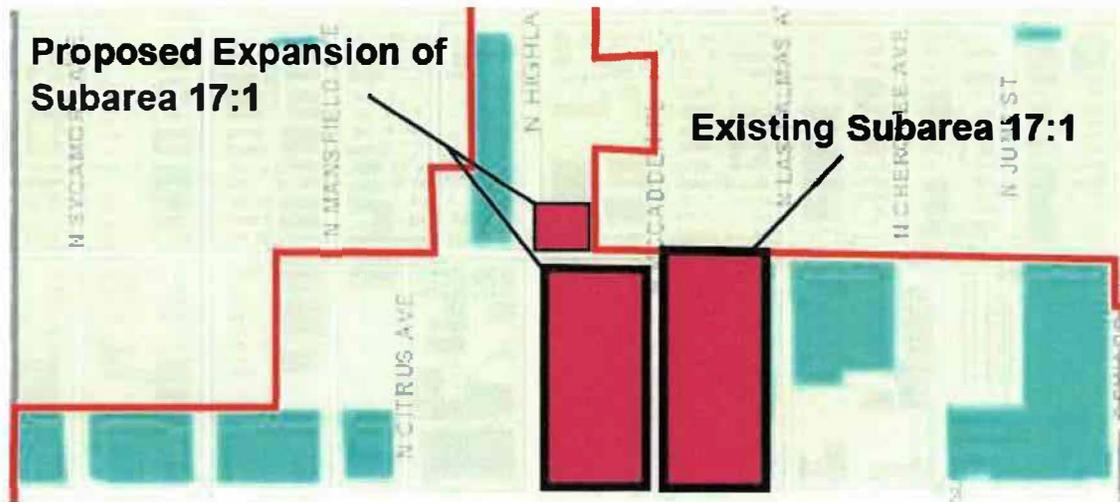
Both Subareas 17:1 and 17:3 are intended to promote targeted media-related uses and jobs. Subarea 17:1 is proposed to be designated as “Community Commercial” and Subarea 17:3 is proposed to be designated as “Hybrid Industrial.”

Existing uses largely include studio-related uses. However, an existing project approved on Santa Monica Boulevard and McCadden Place within Subarea 17:1 includes a 100% residential project with affordable housing (Case No. CPC-2016-1083-GPA-VZC-HD-DB-SPR). Thus, the existing Q Condition for this Subarea is inconsistent with an already-approved project and the demand for development in this area. Additionally, these Subareas include targeted media-related uses so limiting targeted FAR to only media-related uses may be infeasible for future growth and development. Rather, facilitating opportunities for additional commercial uses (e.g., restaurant and retail) is more consistent with the new media uses anticipated for the area.

In addition, the proposed 3:1 FAR is not sufficient for the current and projected for the area. Further, limiting this FAR to 1.5 FAR for projects that do not incorporate targeted-media related uses are not in line with existing 100% residential projects being proposed in the area (Case No. CPC 2016-1083-GPA-VZC-HD-DB-SPR). Similar to other Subareas being proposed in the HMD BID, a lower FAR does not stimulate growth for the region.

Further, we are proposing an expansion of Subarea 17:1 to include the properties as shown in the figure below. A portion of these properties are zoned M1-1VL-SN. However, this Subarea is rapidly changing with the introduction of residential uses and existing commercial uses.

Hence, a change to C2 zoning would unify these parcels and make them consistent with existing and future uses. We are proposing this expansion subject to the approval of the above proposed changes.



## I. Subareas 16, 19, 19:1, 40:5

*Proposed Zoning:* Subareas 16, 19, and 40:5, [Q] C2-2D; Subareas 19:1: [Q] C2-2D-SN

- FAR of 3:1 Hotel or Mixed-Use Projects ( non-residential uses not to exceed 1.5:1 FAR).
- FAR of 1.5: 1 for 100% residential or commercial uses only (non-residential uses not to exceed 0.5:1 FAR).

### *Suggested Revisions:*

- Modify subdivision 1 of the D Limitation to increase FAR to 4.5:1 for all uses with no additional restrictions.

### *Assessment/Rationale:*

Subareas 16, 19, 19:1, and 40:5 are proposed to be designated as “Community Commercial” to “promote housing development and jobs creation, maintain neighborhood compatibility, pedestrian-oriented design, and protect historic resources.” Existing uses include a combination of commercial and residential uses. However, in order to maintain a vibrant commercial district that is compatible with increased growth, a higher FAR without further restrictions is critical. These commercial properties work in tandem to establish a commercial corridor along Santa Monica Boulevard and along Vine Street. These areas will need to have increased FAR and development options to inspire a range of high-density uses including residential and commercial to flow into the HMD BID. At present, the existing FAR and further restrictions do not encourage the types of uses or intensities that are ideal for the HMD BID.

## **J. Subarea 39:1**

*Proposed Zoning:* [Q] C2-1XL

- FAR 1.5:1.

*Suggested Revisions:*

- Increase FAR to 4.5:1.

*Assessment/Rationale:*

Subarea 39.1 is proposed to be designated as “Neighborhood Commercial” to “promote housing development and jobs creation, maintain neighborhood compatibility, pedestrian-oriented design, and protect historic resources.” Existing uses include commercial and studio-related uses. The proposed FAR of 1.5:1 does not support the desire of uses intended for this area. While only a small portion of this Subarea falls within the HMD BID, the Subarea’s presence along Melrose Avenue would be better leveraged and maximized with a greater FAR.

Thus, in order to facilitate the desired uses, the proposed change to this Subarea includes an increase in FAR to 4.5:1.

## **K. Subareas 39:3 and 39:4**

*Proposed Zoning:* Subarea 39:3, [Q] MR1-2D; Subarea 39:4: M1-2D

- FAR 3:1 (with 0.7 FAR for targeted media related industrial uses) otherwise 1.5:1.

*Suggested Revisions:*

- Modify subdivision 1 of D Limitation to increase FAR to 4.5:1 with no additional restrictions.
- Retain proposed zoning but revise to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.

*Assessment/Rationale:*

Subareas 39:3 and 39:4 are proposed to be designated as “Limited Industrial” with the intent to “promote targeted media-related uses.” Existing uses are largely commercial with some studio-related uses. However, commercial developments in the nearby vicinity along La Brea Avenue include more intense uses. For example, the West Hollywood Gateway development directly to the North on Santa Monica Boulevard as well as the creative office, commercial, and studio spaces to the South bordering Willoughby Avenue represent uses at a greater scale and intensity. Subareas 39:3 and 39:4 fall in between these adjacent uses and hence would need a higher FAR in order to remain consistent with and support future development.

As the MR1 and M1 zoning limits residential uses to watchman or caretaker units, residential uses are needed to facilitate the types of development required to support the anticipated future development of the area. Thus, in order to remain consistent with the surrounding area and maximize development potential, the proposed change to this Subarea includes: (1) removal of Q Condition limiting FAR to 3:1 with 0.7 FAR for targeted media related uses and otherwise 1.5:1; (2) increase FAR to 4.5:1 with no additional restrictions; and (3) permit residential uses including artist-in-residence, live-work conversion, multi-family residential developments, and hotels.

## L. Subarea 17:2

*Proposed Zoning:* C2-1-SN

- FAR 1.5:1.

*Suggested Revisions:*

- Expand boundary to include parcels as shown below.
- Change zoning to C4-2D.
- Increase FAR to 4.5:1, with FAR up to 6:1 subject to CPC approval.

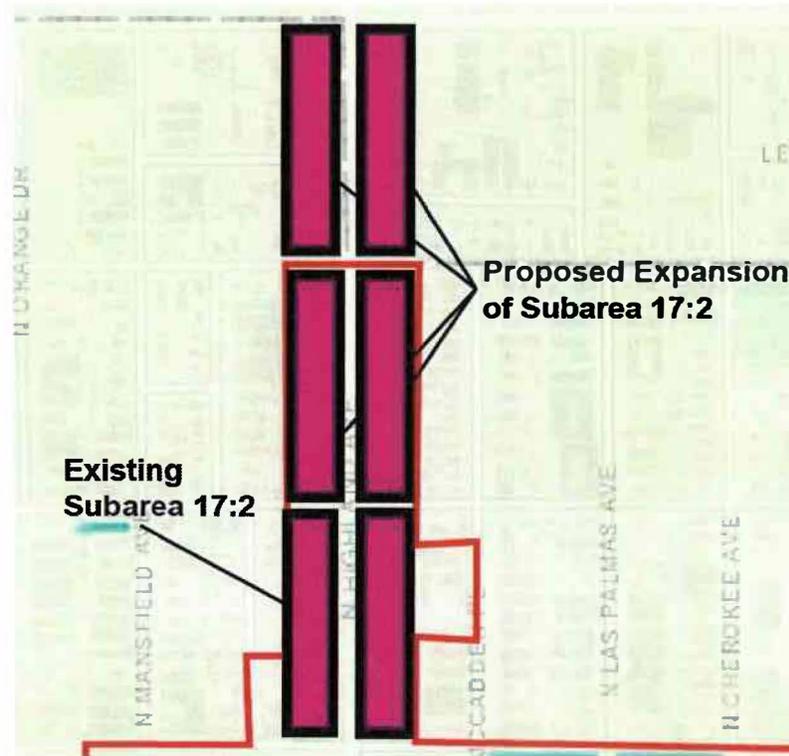
*Assessment/Rationale:*

Subarea 17:2 is proposed to be designated “General Commercial” to “promote housing development and jobs creation, maintain neighborhood compatibility, pedestrian-oriented design, and protect historic resources.” Existing conditions primarily include commercial uses with some scattered residential uses. However, in order facilitate the development of housing and pedestrian-oriented design as the HCPU2 mentions, the uses need to be intensified and permitted at a larger scale. This is supported by recent development in this Subarea including the Highland Apartments, which permitted at 76-unit apartment complex at an FAR of 3:1 (Case No. CPC-2012-2405-VZC-ZAA-SPR).

In addition, the expansion of this Subarea leads into the Regional Center area of the Hollywood Community Plan Area, which is proposed to have intensification of uses and higher FAR. This Subarea is proposed to increase in FAR from the existing 0.5:1 to 1.5:1. However, this is not enough to support the level of growth and development expected of this region because it does not adequately complement the intensification of uses along the commercial corridor on Highland Avenue leading to the Regional Center corridor to the North. Highland Avenue serves as a connecting corridor within Hollywood and particularly within the HMD BID. As existing approved developments already indicate, Highland Avenue is capable of and in a prime location to support and encourage a high intensity of uses. Thus, an FAR of 4.5:1 with discretionary approval for up to 6:1 FAR would complement and enhance the potential uses along this prime corridor along Highland Avenue.

Thus, in order to facilitate the creation of new development and establish consistency with the commercial corridor, the proposed change to this Subarea includes a change in zoning to C4-

2D with an FAR of 4.5:1 and up to 6:1 with CPC approval and an expansion of the boundary of this Subarea to include additional parcels as illustrated in the figure below.<sup>1</sup>



## M. Subarea 40:1A

*Proposed Zoning:* [Q] M1-1

- No residential development permitted, including artist-in-residence or live-work.
- FAR 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q Condition to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Increase FAR to 4.5:1.

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<sup>1</sup> While a portion of the proposed expansion for this Subarea falls outside of the HMD BID boundary, it still impacts the vitality and uses within the BID. Hence, allowing for the same zoning and uses to apply across the boundary will enhance the vibrancy of the area and encourage complementary uses.

*Assessment/Rationale:*

Subarea 40:1A is currently developed with a Public Storage facility and surface parking lot at the intersection of Mansfield Avenue and Santa Monica Boulevard. The proposed Q Condition (subdivision 2) specifically allows for storage building and laundry related uses. While this Q Condition considers the present use of this Subarea, it does not contemplate possible future uses. Subdivision 1 of the Q Condition in fact prohibits residential uses. This is inconsistent with the anticipated future uses of this Subarea and also of the surrounding properties. For example, Subarea 16, located directly across the street from Subarea 40:1A, contemplates and allows for mixed-use, hotel, and/or other residential and commercial uses. The burgeoning film production and art gallery related uses both across from and directly adjacent to this Subarea (e.g., FotoKem – 6855 Santa Monica Boulevard, Steve Turner Gallery – 6830 Santa Monica Boulevard) already create a demand for residential land mixed-use development to cater to the existing employees and visitors.

**N. Subarea 40:2B**

*Proposed Zoning:* C4-1

- FAR 1.5:1.

*Suggested Revisions:*

- Increase FAR to 4.5:1.

*Assessment/Rationale:*

Subarea 40:2B is currently developed with Deluxe Hollywood, a studio use. Adjacent uses to the North include additional studio uses (e.g., Sunset Las Palmas Studios) and residential uses directly across the way to the west and south. In order to continue developing uses that are complementary to existing uses and with desired future uses for the HMD BID, a greater FAR is necessary.

Thus, the proposed change to this Subarea includes an increase in FAR from 4.5:1.

**O. Subarea 17:4**

*Proposed Zoning:* [Q] M1-1VL-SN

- FAR 1.5:1

*Suggested Revisions:*

- Retain proposed zoning but revise to permit residential development, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.

- Increase FAR to 4.5:1.

*Assessment/Rationale:*

Subarea 17:4 is currently developed with the Metropolitan Animal Specialty Hospital and surface parking lot. Adjacent uses include a combination of studios, commercial uses, and surface parking lots. The future uses of the HMD BID will likely include a combination of studio and entertainment-related uses and residential in order to accommodate the anticipated growth of the area and in order to develop into a vibrant district. The current FAR of 1.5:1 is not sufficient to attain these uses.

Thus, the proposed change to this Subarea includes permitting of residential development including artist-in-residence, live-work conversion, multi-family residential developments and hotels and an increase in FAR from 4.5:1.

## **P. Properties on Seward Street and Hudson Avenue**

*Suggested Revision:*

- Increase FAR to 4.5:1 for the following properties: 1110, 1122, 1130, 1146-1148, 1150 Seward Street; 1125-1131 Hudson Avenue.

*Assessment/Rationale:*

The properties listed above are adjacent to proposed Subareas within the HMD BID. While these properties are outside of the HMD BID boundary, the future intensity of uses permitted will greatly impact the properties within the HMD BID. Therefore, in order to seamlessly integrate future uses and encourage complementary uses at the same scale, these properties are also proposed to have an FAR of 4.5:1.

## **Q. Automotive Uses**

*Suggested Revision:* Expand Prohibition of Automotive Uses to all Subareas in HMD BID.

*Assessment/Rationale:*

The HMD BID currently has a significant number of auto-related uses. While the HCPU2 proposes a Q Condition in most of the subareas to prohibit auto-related uses, the Q Condition should be expanded to include the entirety of the HMD BID.

Auto-related uses have continued to expand in the HMD BID area. When potential commercial and residential uses are unable to actualize their potential due to constrained zoning and limited FAR, auto-related uses have taken the front seat in numerous parcels throughout the HMD BID. These uses are not representative of the future potential and desired uses for the HMD BID as discussed extensively in the discussion of the Subareas above. Rather, these auto-related uses

are a hindrance to bringing new and much-needed commercial and residential uses to drive growth.

Thus, in order to provide consistency throughout the HMD BID, the proposed change to these Subareas includes the addition of a Q Condition which prohibits automotive uses as already included for the remainder of the HMD BID.

## **R. Storage Facilities**

*Suggested Revision:* Prohibit additional public storage facilities in HMD BID.

### *Assessment/Rationale:*

The HMD BID currently has a significant number of public storage facilities. Like the auto-related uses, public storage facilities are not representative of the future potential and desired uses for the HMD BID as discussed above. Public storage facilities are a hindrance to bringing new and much-needed commercial and residential uses to drive growth.

## **IV. Open Space and Pedestrian-Oriented Development**

*Suggested Revision:* Create policies to promote pedestrian-friendly design and pedestrian-oriented uses within the HMD BID area.

### *Assessment/Rationale:*

As mentioned above, the zone change to M1 along with an increase in FAR to 4.5:1 and inclusion of residential uses will promote revitalization of this emerging area while preserving and encouraging new studio and entertainment uses. The HMD BID is surrounded by commercial uses and has seen numerous new residential, commercial and mixed-use developments over the last ten years. While the HMD BID welcomes these new projects, the area is in desperate need of additional pedestrian-oriented uses (e.g., restaurants) and pedestrian-friendly design (e.g., street furniture, through-block pedestrian connections, open space, etc.) to serve the new employees, visitors and residents of the area.

Additionally, many of the existing uses are physically enclosed with no street-facing openings for pedestrian access and not built out to maximum intensities. The HMD BID wants development within the area to be cohesive and forward-looking. As such, the HCPU2 should include requirements for street-facing, pedestrian-friendly developments to activate the emerging commercial corridors in this area. While a 4.5:1 FAR and inclusion of residential uses will promote pedestrian-oriented development, the HMD BID also wants the area to have street furniture, wider sidewalks, requirements for open space, through-block connections to break up large developments, public plazas, and outdoor sidewalk cafes.

The changing character of the HMD BID must be taken into consideration in the HCPU2 to ensure growth, future livability and pedestrian-friendly streets. The HCPU2 already recognizes the potential promise of this area, including Theater Row as a potential commercial corridor yet

does not provide this area with the FAR, land use designation or zoning to substantively redevelop the area and provide the pedestrian-oriented development and community benefits needed.

## **V. Cultural Resources**

*Proposed Zoning:* C2 with D Limitation restricting development subject to “historic preservation review” that exceeds FAR 0.5:1 to receive approval from the Office of Historic Resources (“OHR”).

*Suggested Revision:* Delete subdivision 2 of the D Limitation in Subareas 16, 19, 19.1 and 40:5.

### *Assessment/Rationale:*

The HMD BID applauds the City’s recognition of and desire to preserve designated and eligible historic resources within the Hollywood Community Plan Area and we recognize how difficult it is to balance future growth in areas with existing historic resources. The HMD BID has a commitment to both the history and future of its district. The City, however, has taken the proposed development limitations a step too far. The HCPU2 includes unclear and overly restrictive D Limitations on several of the C2-zoned parcels proposed for re-zoning within the HMD BID area. Namely, the City is requiring approval by OHR for development within Subareas 16, 19, 19.1 and 40:5 that is subject to historic preservation review and which exceeds an FAR of 0.5:1.

The proposed D Limitations are problematic. First, none of the parcels within these Subareas contain listed or eligible historic properties subject to historic preservation review. The properties are not under consideration as HCMs or within a designated Historic Preservation Overlay Zone. Each parcel even has a “No” under the “Historic Preservation Review” category in Zimas. Yet, the proposed D Limitation severely restricts future development at these sites with no essential nexus to the existing conditions of the Subareas. The City reasons in the Hollywood Land Use and Zone Change Matrix that this change will “protect historic resources,” but there are no historic resources in these Subareas.

Second, the City has provided no guidance on the required approval by OHR, or whether the approval would be a ministerial or discretionary process. This does not provide property owners, stakeholders or future project proponents with the ability to understand the proposed zoning limitations or how it will impact their property. It is unclear how the City would even implement this provision given that none of the properties are subject to historic preservation review at this time.

## **VI. Conclusion**

The HMD BID urges the City to reconsider the proposed zoning and land use designations for the area. While the HMD BID wishes to preserve and encourage traditional entertainment and studio uses, it has witnessed substantial change over the last ten years that must be accounted

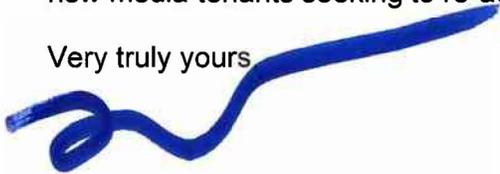
# SheppardMullin

Linda Lou  
January 31, 2019  
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for in the HCPU2. The proposed zoning in the HCPU2 will hinder the future development and potential of the HMD BID areas for years to come.

To close, please consider permitting residential uses and allowing a greater FAR for the area. These forward-looking revisions will allow the HMD BID to not only become an employment and economic driver in the Hollywood Community Plan area, but an attractive area for additional new media tenants seeking to re-activate the area.

Very truly yours



Alfred Fraijo Jr.  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:488864652.14

CC: Council Member David Ryu, CD 4  
Council Member Paul Koretz, CD 5  
Council Member Mitch O'Farrell, CD 13  
Deputy Mayor Barbara Romero

# EXHIBIT B

December 16, 2019

213.617.5567 direct  
afraijo@sheppardmullin.com

File Number: 56FW-270531

## VIA HAND DELIVERY AND E-MAIL

Ms. Linda Lou  
City Planner  
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Los Angeles, California  
linda.lou@lacity.org

Re: Comments on the Partially Recirculated Draft Environmental Impact Report (ENV-2016-1451-EIR, SCH No. 2016041093) for the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Ms. Lou:

We represent the Hollywood Media District ("HMD BID"). As a key stakeholder in Hollywood, the HMD BID would like to provide the following comments on the partially Recirculated Draft Environmental Impact Report ("RDEIR") released by the City of Los Angeles ("City") for public review on October 31, 2019.

We would like to express our appreciation for the City's review and partial incorporation of the HMD BID's suggested revisions to the draft Hollywood Community Plan Update ("HCPU2"), submitted (attached as Exhibit A) to the City on January 31, 2019 ("First Comment Letter"), in response to the HCPU2 and the associated Draft Environmental Report ("DEIR").

As a reminder, the First Comment Letter requested the following:

- Increase in FAR in the HMD BID area from the proposed 1.5:1 or 3:1 to 4.5:1.
- Permit mixed-use residential projects, including hotel uses within targeted areas proposed for industrial and commercial uses.
- Prohibit automotive and storage uses in the HMD BID area.
- Update the definition of the HMD BID to better reflect the changed conditions of this developing area as one incorporating innovation and media/tech-related uses, other office or commercial uses, gallery spaces, and design firms rather than exclusively industrial uses. Examples of new media uses include the recent creative office spaces developed in the area for companies such as BuzzFeed, SiriusXM, Quibi, WndrCo as

well as significant art galleries such as the Kohn gallery, the Jeffrey Deitch Gallery. In addition, in a space that previously served as a small plating factory, there is an office for Kaiser Permanente that also serves patient needs.

As discussed in more detail below, this letter emphasizes the requests articulated in the First Comment Letter and highlights new information that has developed since the comment period closed in January 2019. This letter also supplements the updated Vehicle Miles Traveled ("VMT") methodology presented in the RDEIR by demonstrating that our request to allow mixed-use residential projects in the subareas (e.g., Subareas 40, 40:1B, 40:1, 40:2, 39:3, 39:4, etc.) south of Santa Monica Boulevard within the Limited Industrial zones is consistent with the objectives of the HCPU2 and will not cause a significant environmental impact related to VMT.

### **I. VMT Methodology**

The prohibition of residential uses in a large portion of the HMD BID is a missed opportunity for the City for three reasons: proximity to transit, jobs, and growth potential. An area with transit, jobs and growth potential is exactly the area where housing should be permitted from a transportation (and planning) perspective because the addition of housing and locally-serving retail uses will shorten trips, reduce VMT, and not cause significant VMT impacts. As discussed in more detail below, Gibson Transportation has prepared a VMT sensitivity analysis ("Gibson VMT Analysis") at representative intersections in the HMD BID that demonstrates this point. (See Exhibit B, Sensitivity VMT Analysis Summary.)

A major transit corridor cuts through the middle of the HMD BID, which means that the HMD BID is almost entirely within a Transit Priority Area.<sup>1</sup> The Metro Rapid Bus Line on Santa Monica Boulevard serves the most riders south of Sunset Boulevard and west of the U.S. 101 in Hollywood. (See Figure 4.15-5, RDEIR; Figure 6-2, HCPU2.) Throughout the DEIR, RDEIR, and HCPU2, the City recognizes this area as a "key transit corridor" yet prohibits housing and only permits mixed-use development in certain, very limited areas north of Santa Monica Boulevard.

The area has unequivocally moved away from its industrial past and has changed – and is quickly changing – into the epicenter of new media and next generation workplaces in Hollywood. The HCPU2 recognizes this potential and even projects the HMD BID to absorb the largest employment growth rate of all the other regions at 11%. (DEIR, Appendix J, Hollywood Community Plan Model Development Report p. 14.) And, despite the fact that the City has not permitted housing in most of the HMD BID area, this subregion is anticipated to have the second largest population growth percentage after the Regional and Corridor Subregion (directly to the North of the HMD BID) at 36%. (DEIR, Appendix J, Hollywood Community Plan Model Development Report p. 14.)

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<sup>1</sup> Transit Priority Area means an area within one-half mile of a major transit stop that is existing or planned. A "major transit stop" is a site that contains an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. (See Section 21099(d)(1) and ZI No. 2451.)

The Transportation and Traffic chapter in the RDEIR incorporates the VMT methodology and concludes that impacts related to VMT would be less than significant for the HCPU2 area. To reach this conclusion, the analysis relies heavily on the fact that certain transit-rich corridors near Metro subways and bus lines are slated for dense, mixed-use development. The analysis relies on the macro-level, service population projections from Southern California Association of Governments ("SCAG") rather than specific projects or intersections within the HCPU2 area. And the analysis specifically calls out subways and bus lines as "focal points and activity centers" supporting new development that "accommodates a variety of uses." While the chapter does not identify specifically which bus lines it is referring to, the Gibson VMT Analysis is based on the recently adopted *Transportation Assessment Guidelines* (LADOT, July 2019) and the *City of Los Angeles VMT Calculator Version 1.2* (November 2019), with per capita thresholds at intersections in the HMD BID near the Metro Rapid Bus Line on Santa Monica Boulevard.

The Gibson VMT Analysis assumes a hypothetical, mixed-use project with 300 dwelling units and 50,000 square feet of commercial office space at six representative intersections in the HMD BID, (1) Orange Drive and Romaine Street; (2) Sycamore Avenue and Santa Monica Boulevard; (3) Vine Street and Santa Monica Boulevard; (4) Highland Avenue and Melrose Avenue; (5) Seward Street and Santa Monica Boulevard; and (6) Cahuenga Boulevard and Willoughby Avenue.<sup>2</sup> The hypothetical project also incorporates typical project-design features, including additional bicycle parking, pedestrian improvements in and around the site, residential unbundling of parking, etc. As expected, none of the hypothetical projects trigger a significant VMT impact because mixed-use residential projects near transit typically generate fewer vehicle trips and shorter trip distances due to the interaction between land uses that encourage walking or short-distance travel and the availability of alternative transportation modes that reduce dependence on private vehicles.

In other words, in the HMD BID area, the addition of residential dwelling units actually shortens trips and improves the jobs-to-housing balance because of the abundance of employment opportunities in the area. The HMD BID's request to permit residential uses alongside commercial and industrial uses is also consistent with the goals of the Framework Element and the HCPU2 to place residential dwelling units and mixed-use corridors near transit.

## II. Land Use

### A. Subareas 40, 40:1B, 40:2

*Proposed Zoning:* [Q] M1-2D; [Q] M1-2D-SN

- No residential development, including artist-in-residence or live-work conversion.
- Maximum FAR of 3:1 with 0.7 FAR for targeted media-related uses.
- For Subarea 40:1B, the maximum FAR of 3:1 is permitted only for developments on lots that are located within a minimum distance of 150 feet south of Santa Monica Boulevard.

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<sup>2</sup> See [Exhibit C](#), Map of Intersections in Gibson VMT Analysis.

- For Subarea 40:1B, MR-1 uses only along Santa Monica Boulevard between McCadden Place and Lilian Way and within 150 feet of the property line along Santa Monica Boulevard.

### *Suggested Revisions:*

- Retain proposed zoning but revise the Q condition to permit mixed-use residential developments, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Increase FAR to 4.5:1.
- Permit M1 uses along Santa Monica Boulevard between McCadden Place and Lilian Way and permit an FAR of 4.5:1 on lots that are located within a minimum distance of 150 feet south of Santa Monica Boulevard.
- Remove 36 feet height limit within 150 feet of the property line along Santa Monica Boulevard.

### *Assessment/Rationale:*

While the City has incorporated our request to increase FAR within Subareas 40, 40:1B and 40:2, there is still a perfect planning opportunity that should be considered and incorporated into the HCPU2. Specifically, and as explained in detail in this letter and in the First Comment Letter, there remains fundamental additions that should be incorporated into the HCPU2 (including the addition of residential uses) that will promote the current and long-term development goals of the City.

As mentioned above, these subareas are in a key transit corridor served by the Metro Rapid Bus with three stops on Santa Monica Boulevard at Vine Street, Highland Avenue, and La Brea Avenue. These subareas are also well-known job centers for studio and media-related uses, Theatre Row, and emerging creative office spaces. Gibson's VMT Analysis demonstrates that a medium to large-scale, mixed-use project at representative intersections in these subareas (i.e., Sycamore/Santa Monica, Sycamore/Orange, Highland/Santa Monica, Vine/Santa Monica,<sup>3</sup> Seward/Santa Monica, Cahuenga/Willoughby) would not trigger a significant impact related to VMT because the addition of housing actually shortens trips, encourages walking, and improves the jobs-to-housing balance. The City should place residential uses in areas with jobs and transit opportunities to complement the existing uses in the area.

Furthermore, given the City's extreme housing crisis and increasing homeless population, it would be proper to allow mixed-use residential developments in these areas, particularly since, as proposed, the other commercial uses will remain and not be displaced by the proposed, critically-needed residential uses. Additionally, the City is far behind the Regional Housing Needs Assessment ("RHNA") developed by SCAG. Specifically, RHNA requires the City to provide zoning that accommodates approximately 82,000 housing units between October, 2014

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<sup>3</sup> The Vine Street and Santa Monica Boulevard intersection is one block east of Subarea 40:1B.

and October, 2021 (“5th Cycle”). Of the 82,000 units, approximately 46,590 units are to be reserved for low-income, very low-income, and moderate-income housing (collectively “affordable units”). However, per the City’s 5th Cycle Housing Element RHNA Progress Chart, only 7,280 affordable units were constructed between 2014 and 2018 – resulting in approximately 1,450 affordable units per year. If affordable housing growth continues at this rate through the remainder of the 5th Cycle, Los Angeles will miss its target for affordable units by approximately 75%.

Housing needs in Los Angeles are expected to increase materially in the coming years, exacerbating the need for market-rate and affordable units. SCAG is currently developing the RHNA housing allocation for the period between October 2021 through October 2029 (“Draft 6th Cycle Allocation”). The Draft 6th Cycle Allocation will require 463,682 housing units to be developed in the City over the next eight years, of which 263,956 units are to be affordable units. This is nearly six times the (yet unmet) needs identified for the 5th Cycle. Revising the HCPU2 to increase the FAR and expanding permitted residential uses can help accommodate this growth and assist the City in reaching its housing targets.

Additionally, a large portion of these subareas is under-developed and not built out to full development capacity. An expansion of permitted uses to include residential and additional FAR could accommodate future projected growth. New proposed development in the area is consistent with the suggested revisions and the development potential of the area. For example, the approved mixed-use project with 231 dwelling units and 15,000 square feet of retail space at 6901 Santa Monica Boulevard is under construction (Case No. CPC-2015-4611-GPA-VZC-HD-DB-MCUP-WDI-SPR) and the 787 unit mixed-use development at 6677 West Santa Monica Boulevard (Case No. CPC-2006-9797-MPR-CUB) is nearing completion. These projects are north of Santa Monica Boulevard and consistent the HMD BID’s request to provide residential uses and greater FAR as they are across the street from Subareas 40 and 40:1B. Complementary residential uses along both sides of Santa Monica Boulevard, a major transit corridor, makes sense from a planning perspective and is consistent with the nearby new development, RHNA housing goals, and opportunity to reduce VMT impacts.

## **B. Subarea 17:2**

*Proposed Zoning: C2-1-SN*

- FAR 1.5:1.

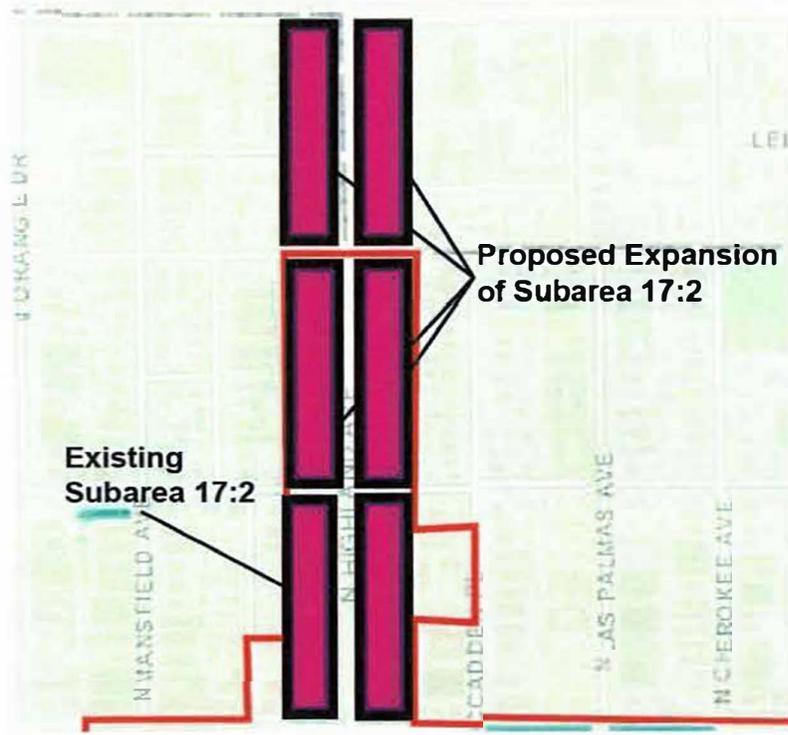
*Suggested Revisions:*

- Expand boundary to include parcels as shown below.
- Change zoning to C4-2D.
- Increase FAR to 4.5:1, with FAR up to 6:1 subject to CPC approval.

## Assessment/Rationale:

We reiterate the suggested revisions we made in the First Comment Letter and further emphasize the need for more-intensive development standards in Subarea 17:2. Our request to increase FAR to 4.5:1 is supported by the fact that Highland Avenue between Sunset Boulevard and Santa Monica Boulevard is an existing commercial corridor that connects the HMD BID to the Regional Commercial Center area of Hollywood. The corridor is also close to both rail and bus transit, which is consistent with the City's VMT methodology to focus growth in higher-intensity commercial centers close to transportation and services. There is a Metro Rapid Bus stop at Highland Avenue and Santa Monica Boulevard and a Metro Rail stop at Hollywood Boulevard and Highland Avenue.<sup>4</sup>

Additionally, expanding Subarea 17:2 (see map below) and revising the zoning could accommodate additional housing units to serve the City's goal of facilitating additional housing units in pedestrian-oriented neighborhoods next to job hubs and transit centers. This subarea is proposed to be designated as "General Commercial," which will allow mixed-use development and additional job-creating uses. As stated in our First Comment Letter, recent projects in the area, including the Highland Apartments, a 76-unit residential development approved for a maximum FAR of 3:1, (Case No. CPC-2012-2405-VZC-ZAA-SPR) support increased densities and FAR. Our request is further supported by a recently approved project on 6753 W Selma Avenue (Case No. DIR-2018-4525-TOC), which proposes a 7-story, 51-unit mixed-use TOC development with a maximum FAR of 4.25:1.



<sup>4</sup> See [Exhibit D](#), Metro Rapid Bus 704 Route Map.

**C. Subareas 17:1 and 17:3**

*Proposed Zoning:* Subarea 17:1 [Q] C2-2D-SN; Subarea 17:3: [Q] CM-2D-SN

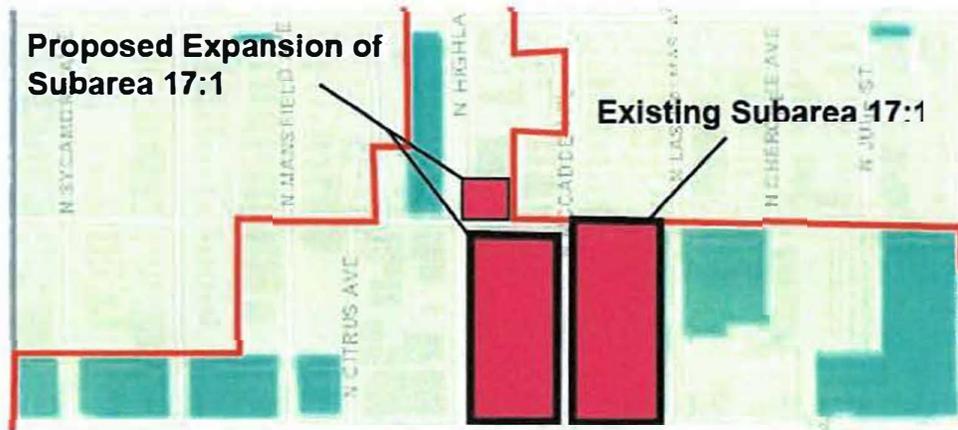
- No 100% residential developments permitted.
- Residential uses only permitted with 0.7:1 FAR dedicated to targeted media related uses and/or community serving benefits.
- FAR 3:1 (with 0.7 FAR for targeted media related industrial uses) otherwise 1.5:1.

*Suggested Revisions:*

- Retain proposed zoning but revise subdivision 1 of the Q condition to permit 100% residential developments, including artist-in-residence, live-work conversion, multi-family residential developments and hotels.
- Modify subdivision 1 of the D limitation to increase FAR to 4.5:1.
- Expand boundary of Subarea 17:1 to include 1125 N. McCadden Place, 1119 N. McCadden Place, 1145-1155 N. McCadden Place, 6762 Lexington Avenue, 6769 Lexington Avenue, 1136 N. Highland Avenue and 1204 N. Highland Avenue.

*Assessment/Rationale:*

Recent projects in the vicinity of Subareas 17:1 and 17:3 support our request to increase FAR to 4.5:1. Most notably, the Los Angeles LGBT Center located within Subarea 17:1 recently opened its new campus with services and housing for youth and seniors to include 100% affordable, 100-unit senior housing and an additional five-story, 35-unit affordable housing building within a maximum FAR of 3:1. (See Case No. CPC 2016-1083-GPA-VZC-HD-DB-SPR.) Another approved project located at 6677 West Santa Monica Boulevard immediately adjacent to Subarea 17:3 is slated to include 787 residential units and 21,000 square feet of retail space within a maximum FAR of 3.5:1. (See Case No. CPC-2006-9797-MPR-CUB.) These projects support the need for residential development at a greater density and FAR within these subareas. For similar reasons as discussed above, granting these requests and expanding the boundary of Subarea 17:1 as shown below will allow for the creation of additional housing as well as reduce VMT.



### III. HMD BID Definition

As discussed in our First Comment Letter, the existing HCPU2 text defines the HMD BID throughout as an industrial-only area. There are numerous examples of projects included in this letter and within the First Comment Letter, which demonstrate the changed conditions of the area and the emergence of new media, general office, interior design, art galleries, and mixed-use developments that go beyond the scope of industrial-only uses – while maintaining and improving the HMD BID as a jobs-focused area. The HMD BID is positioned to integrate complementary residential and commercial uses with the existing industrial spaces in order to provide additional housing for the City and reduce impacts related to VMT.

In closing, the HMD BID has great untapped potential to support the housing demands of the City. The HMD BID has seen an increased interest in mixed-use development, including studios, creative office space, housing, and community-serving retail. Permitting these uses with mixed-use residential development is critical to achieving the City's housing goals and reducing VMT impacts. As such, the City should incorporate our requests for residential development and additional FAR into the updated HCPU2.

Very truly yours,

Alfred Fraijo Jr.  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4813-4036-5486.11

cc: David M. Bass, HMD BID, President  
Council Member David Ryu, CD 4  
Council Member Paul Koretz, CD 5  
Council Member Mitch O'Farrell, CD 13  
Deputy Mayor Barbara Romero