

## Communication from Public

**Name:** Richard H. Platkin

**Date Submitted:** 04/19/2023 02:14 PM

**Council File No:** 21-0934

**Comments for Public Posting:** To: City Council From: Richard H. Platkin, rhplatkin@gmail.com, 6400 W. 5th Street, LA, CA 90048 Re: Opposition to Hollywood Community Plan Update You only need to look at City Hall's second effort to update the Hollywood Community Plan to watch the march of folly close up. Former Superior Court Judge Allan J. Goodman overturned the previous 2012 Update for being "fundamentally and fatally flawed" He offered three reasons, all of which hold true for the 2021 update, which the City Council will consider in May 2023. Reason 1. The current (2021) Update is also based on outdated demographic data, in this case 2010 census data that is now 13 years old. As for three year old 2020 census data, the new Update and its Environmental Impact Report excludes it. Reason 2. The current Update also fails to expand municipal services and infrastructure to meet the needs of the people and buildings it intends to attract to Hollywood through widespread up-zoning. Reason 3. The current Update, like the previous 2012 version, did not adequately consider its environmental impacts. Methodological flaws repeat: When the Los Angeles City Council adopted the 2012 Hollywood Update, I wrote about its four methodological flaws. All four reappear in the new Update: • Improper Sequencing: The current Update, like the 2012 Update rejected by Superior Court Judge Allan J. Goodman, is improperly sequenced. It should have followed, not preceded, the update of the General Plan's mandatory and optional citywide elements, most of which are in urgent need for updating. For example, the City Council adopted the General Plan elements for Infrastructure and for Public Services in the late 1960's. Since then Los Angeles has experienced enormous changes but these two Elements have never been rescinded or brought up-to-date. • General Plan Conflicts: The court-annulled 2012 Update, like the current Update, conflicts with the General Plan Framework Element. The Framework is an explicitly growth-neutral plan, not a growth-inducing plan, like both Hollywood Community Plan Updates. In fact, Judge Goodman's 2013 decision directly quoted from the General Plan Framework: "The Framework Element does not mandate or encourage growth." • Failure to Calculate Existing Zoning Buildout: The 2012 Update, like the current update, does not calculate the build out of existing zoning, as well

as zoning entitlements already granted to developers. Luckily, this data is available from other sources. According to Hollywood Heritage, “No up-zoning is needed in Hollywood. All 34,000 residential units supposedly needed in the Hollywood Community Plan area have been constructed, permitted, or entitled since the preparation of the plan’s DEIR in 2016.” • Missing Monitoring Program: The 2012 Update, like the current update, did not include a monitoring program to determine if its demographic and infrastructure assumptions were correct, or if they should be amended to reflect actual conditions. In light of these and other errors, a key question remains. Has City Planning accurately responded to Judge Allan Goodman’s stunning rebuke of the previous 2012 Update of the Hollywood Community Plan? Based on my review of the current update, my answer is NO. The current (2021) version repeats the same errors that sunk the 2012 Hollywood Community Update: The Current Update Ignores with Zoning Build-out Data. The current Update is based on the unsupported claim that Hollywood’s existing zoning does not allow sufficient housing to meet the needs of future Hollywood residents. This, in fact, is the Update’s rationale for the extensive up-zoning in its attached land ordinance. But Hollywood’s existing zoning allows for many thousands of by-right apartment buildings located on transit corridors, all of which qualify for TOC density bonuses. If City Planning had made these calculations, the Hollywood Community Plan’s existing zoning would allow 430,000 people. Furthermore, if Accessory Dwelling Units (ADU’s) and TOC Density Bonuses were added, Hollywood’s build-out population would be 580,000 people. This is far more than SCAG’s 2040 population forecast of 226,000 residents, as well as City Planning’s inexplicable Reasonable Expected Development projected population of 243,000 to 264,000 residents. Supposedly, their housing needs can only be met through the Update’s widespread up-zoning program. The conclusion is obvious. The Hollywood Community Plan area has more than enough parcels whose current zoning allows for either population forecast. There is no need for the plan’s Up-zoning Ordinance. Conflicts with the General Plan. The second Hollywood Update claims that it is consistent with LA’s adopted General Plan, but this is incorrect because the General Plan Framework Element is growth neutral, while the Hollywood Community Plan Update is growth-inducing. Furthermore, the Framework contains two criteria for up-zoning, neither of which appear.

# In 2023 City Hall repeats the same errors that Judge Goodman cited when he nullified the 2012 Hollywood Community Plan

By Dick Platkin\*



**PLANNING WATCH** - You only need to look at City Hall's second effort to update the Hollywood Community Plan to watch the march of folly close up. Former Superior Court Judge Allan J. Goodman [overturned the previous 2012 Update](#) for being "*fundamentally and fatally flawed*" He offered three reasons, all of which hold true for the 2021 update, which the City Council will finally consider in May 2023.

**Reason 1.** The current (2021) Update is also based on outdated demographic data, in this case 2010 census data that is now 13 years old. As for three year old 2020 census data, the new Update and its Environmental Impact Report excludes it.

**Reason 2.** The current Update also fails to expand municipal services and infrastructure to meet the needs of the people and buildings it intends to attract to Hollywood through widespread up-zoning.

**Reason 3.** The current Update, like the previous 2012 version, did not adequately consider its environmental impacts.

**Methodological flaws repeat:** When the Los Angeles City Council adopted the 2012 Hollywood Update, I wrote about its four methodological flaws. All four reappear in the new Update:

- **Improper Sequencing:** The current Update, like the 2012 Update [rejected by Superior Court Judge Allan J. Goodman](#), is improperly sequenced. It should have followed, not preceded, the update of the General Plan's mandatory and optional [citywide elements](#), most of which are in urgent need for updating. For example, the City Council adopted the General Plan elements for [Infrastructure](#) and for [Public Services](#) in the late 1960's. Since then Los Angeles has experienced enormous changes but these two Elements have never been rescinded or brought up-to-date.
- **General Plan Conflicts:** The court-annulled 2012 Update, like the current Update, conflicts with the General Plan Framework Element. The Framework is an explicitly growth-neutral plan, not a growth-inducing plan, like both Hollywood Community Plan Updates. In fact, Judge Goodman's 2013 decision directly quoted from the General Plan [Framework](#): "*The Framework Element does not mandate or encourage growth.*"
- **Failure to Calculate Existing Zoning Buildout:** The 2012 Update, like the current update, does not calculate the build out of existing zoning, as well as zoning entitlements already granted to developers. Luckily, this data is available from other sources. According to Hollywood Heritage, "*No upzoning is needed in Hollywood. All 34,000 residential units supposedly needed in the Hollywood Community Plan area have been constructed, permitted, or entitled since the preparation of the plan's DEIR in 2016.*"
- **Missing Monitoring Program:** The 2012 Update, like the current update, did not include a monitoring program to determine if its demographic and infrastructure assumptions were correct, or if they should be amended to reflect actual conditions.

In light of these and other errors, a key question remains. [Has City Planning accurately responded to Judge Allan Goodman's stunning rebuke of the previous 2012 Update of the Hollywood Community Plan?](#) Based on my review of the current update, my answer is NO. The current (2021) version repeats the same errors that sunk the 2012 Hollywood Community Update:

**The Current Update Ignores with Zoning Build-out Data.** The current Update is based on the unsupported claim that Hollywood's existing zoning does not allow sufficient housing to meet the needs of future Hollywood residents. This, in fact, is the Update's rationale for the extensive up-zoning in its [attached land ordinance](#). But Hollywood's existing zoning allows for many thousands of by-right apartment buildings located on transit corridors, all of which qualify for TOC density bonuses. If City Planning had made these calculations, the Hollywood Community Plan's **existing zoning** would allow 430,000 people.

Furthermore, if Accessory Dwelling Units (ADU's) and TOC Density Bonuses were added, Hollywood's build-out population would be 580,000 people. This is far more than SCAG's 2040 population forecast of 226,000 residents, as well as City Planning's inexplicable *Reasonable Expected Development* projected population of 243,000 to 264,000 residents. Supposedly, their housing needs can only be met through the Update's [widespread up-zoning program](#).

The conclusion is obvious. *The Hollywood Community Plan area has more than enough parcels whose current zoning allows for either population forecast.* There is no need for the plan's [Up-zoning Ordinance](#).

**Conflicts with the General Plan.** The second Hollywood Update claims that it is consistent with LA's adopted General Plan, but this is incorrect because the General Plan Framework Element is growth neutral, while the Hollywood Community Plan Update is growth-inducing. Furthermore, the Framework contains two criteria for up-zoning, neither of which appears in the Update. The first criterion is evidence that existing zoning *cannot* meet the housing needs of future residents. The second is evidence that existing infrastructure and public services can support the needs of additional people and buildings resulting from up-zoning.

**Inadequate Municipal Services and Infrastructure.** The Hollywood Community Plan Update's [Draft Environmental Impact Report](#) is clear that Hollywood's aging infrastructure will not be upgraded. The DEIR's rationale for this is that all new buildings and their residents will be located in areas with surplus infrastructure and public service capacity. As for data substantiating this claim, it is not presented, presumably because it does not exist.

**Outdated and Inaccurate Demographic Data.** In 2023 the City Council will finally consider and vote on the second Hollywood Community Plan Update, 13 years after the Bureau of the Census collected the 2010 census data. After that, in 2016 the Census Bureau extrapolated its 2010 data, which City Planning adjusted with State Department of Finance and Southern California Association of Governments (SCAG) population forecasts. Most revealingly, City Planning's 2040 population forecast exceeds SCAG's 2040 forecast by 17,000 - 48,000 people.

**Ignored Environmental Impacts.** Every major project and plan, including the second update of the Hollywood Community Plan, has serious environmental impacts. These include Greenhouse Gas emissions created by new buildings and the traffic they generate. These adverse impacts can only be mitigated by a project's redesign, presented as the DEIR's *Environmentally Superior Alternative*. In Hollywood this option is called the *Reduced Transit Oriented Development and Corridors Alternative*. To reject it, the Update required a [Statement of Overriding Considerations](#). It claims that the updated Community Plan promotes energy efficiency and results in so much transit use that decision makers can reject the Environmentally Superior Alternative, without any need to document that energy efficiency and increased transit ridership appeared. If this sounds like a give-away to major property owners, it probably is.

**Improper General Plan Sequencing.** Like the 2012 plan that Judge Goodman totally rejected, the current Hollywood Update frequently references the 27-year-old [General Plan Framework Element](#), while ignoring other General Plan elements, particularly the old [Infrastructure Systems](#) and [Public Facilities and Services](#) element. City Hall should thoroughly update these old General Plan elements before updating a Community Plan that claims it only adds new buildings and people to Hollywood neighborhoods with surplus infrastructure capacity.

**Failure to Monitor the Update.** The General Plan Framework required City Hall to establish a General Plan Monitoring Unit that would prepare and distribute an annual

plan monitoring report. Without these reports, it is impossible to determine if the Hollywood Community Plan's implementation programs exist and if they meet the plan's goals. Furthermore, without monitoring, it is impossible to know if the Hollywood Plan's demographic forecasts are correct or if they, too, should be rectified.

In 2013, when Judge Allan Goodman ruled that the 2012 Hollywood Community Plan Update was fatally flawed, he unintentionally revealed a misuse of Community Plan updates to increase the value of commercial parcels through up-zoning. The second revision of the Hollywood Community Plan also has this same fatal flaw.



**What therefore lies ahead in light of this fatal flaw?** If the City Council adopts the 2021 update and it prevails against lawsuits, this is what Hollywood should expect:

1. Most up-zoned parcels will be flipped, and few affordable units will be built.
2. Homelessness will grow because low-income apartments will be replaced by expensive units unaffordable to most Hollywood residents.
3. Transit ridership will further decline because Hollywood's remaining transit dependent residents will be gradually forced out by rising housing costs.

Finally, when the Update's stated objectives are not met, City Hall will overlook its failures as long as [Hollywood's building boom](#) continues.

*\* Dick Platkin is a retired Los Angeles city planner who reports on local planning issues for [CityWatchLA](#). He serves on the board of United Neighborhoods for Los Angeles ([UN4LA](#)). Previous Planning Watch columns are available at the [CityWatchLA archives](#). Please send questions and corrections to [rhplatkin@gmail.com](mailto:rhplatkin@gmail.com).*

## Communication from Public

**Name:** Christopher Barton

**Date Submitted:** 04/19/2023 02:41 PM

**Council File No:** 21-0934

**Comments for Public Posting:** I support the Hollywood Central Park, a proposed deck park over US 101 within the Hollywood Community Plan area. The Hollywood Central Park will create much needed open space and 38 acres of new park acreage, addresses environmental and social justice, and curb the effects of the climate crisis. As a Hollywood Stakeholder, I request that you please vote to approve the Hollywood Community Plan Update as presented by the Department of Planning.

## Communication from Public

**Name:**

**Date Submitted:** 04/19/2023 08:17 PM

**Council File No:** 21-0934

**Comments for Public Posting:** Attached you will find Hollywood Heritage Hollywood Community Plan DEIR comments submitted for inclusion as required as a part of the HCPU EIR process and the City Planning Commission review. As this document does not seem to be a part of the Council File, please include this copy in the Council File.



**HOLLYWOOD HERITAGE, INC.**  
**P.O. Box 2586**  
**Hollywood, CA 90078**  
**(323) 874-4005 • FAX (323) 465-5993**

January 31, 2019

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**RE: Hollywood Community Plan Draft EIR Comments**

Dear Ms. Lou:

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members thank you for the opportunity to review and comment on the draft EIR for the Hollywood Community Plan Update. We have had lengthy discussions about the role of historic resources in the Plan since 2012. We appreciate the efforts of Planning staff during that time.

**About Hollywood Heritage, Inc.** For over 35 years, Hollywood Heritage has been an advocate of the preservation and protection of Hollywood's historic resources. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development. Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in cooperation with City Planning on public policy discussions, including the formulation of the Hollywood Redevelopment Plan of 1986, improvements of preservation language in former Community Plans, and subsequent urban design plans. These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood.

Hollywood Heritage strives to protect historic and cultural resources, and preserve single-family neighborhoods. Historic Resources also include duplexes, tri-plexes, and multi-family housing. The organization also ensures that Hollywood's historic commercial streetscapes retain their integrity. The goal of the past five years has been to see preservation integrated into Hollywood's planning and environmental analysis in an effort to standardize and immediately address the issues of preservation.

The 2012 Hollywood Community Plan EIR and the current Community Plan Update concluded that the Plan had significant unavoidable adverse impacts, such as demolition, poor alterations, and incompatible neighboring development on historic buildings. Hollywood Heritage believed and continues to believe that

detailed planning can avoid these impacts, and we seek to build on the policies devoted to preservation in the current document.

After review of the EIR and the specific sections highlighted below, it is simple to see that the City presents an inherent conflict with its treatment of Hollywood's historic and cultural resources as outlined in this EIR. The EIR states that one of the primary planning objectives is to "protect" Historic and Cultural Resources and at the same time states that the City is also planning on a significant and irreversible loss of Hollywood's historic resources without mitigation, except for Archaeological Resources, Paleontological Resources, and Tribal Cultural Resources.

- The DEIR Alternatives analysis states that all of the alternatives result in a "partially consistent" plan outcome with the exception of Alternative 2, which is deemed "consistent." These stated determinations **do not adequately explain (or resolve) the conflict.** The "No Development" Alternative is the only possible environmentally superior alternative, but the wholesale brushing away of any planning solutions to the newly created conflicts in the EIR cuts off even that discussion.
- However, no clear consideration for planning is included to impose either additional incentives or penalties for historic buildings that are being demolished by neglect. Incentives or penalties would mitigate demolition and maximize the use of the existing building stock, a more sustainable option of using the existing built environment, to achieve planning objectives. The Land Use Plan may have a few attempts to incorporate zoning limitations to save a few historic buildings. The proposed CPIO could help, if robustly expanded and improved to include already extant CRA mitigations, but these options are not currently included in the Plan.
- The DEIR and the Plan Text omit serious discussion of CRA as the lead agency for land use and preservation in central Hollywood for the last 30 years. The dissolution of the Community Redevelopment Agency has further complicated land use decisions in a significant portion of the Plan area. As you know, Hollywood Heritage prevailed in a lawsuit in 2009 to enforce procedures, approvals, and public access to historic surveys and various plans and design guidelines, directly intended to promote and protect historic buildings-- which the CRA was supposed to produce. CRA had responsibilities and obligations which by law could only restrict zoning which continue today. The DEIR fails to mention that the City Planning Department must accept these obligations. Thus zoning tools like the CPIO (which matches the boundaries of the former Redevelopment Area) are critical long term planning tools that must be fully developed.
- The implementation tools in the 1988 Community Plan have not been carried forward in this proposed 2018 Plan. TDRs, proactive listing of identified buildings as HCMs and HPOZs, and Specific Plans to protect identified historic planning areas, design guidelines, and commercial overlay zones should be the tools used to mitigate substantial adverse effect on historic resources. This is a reason why the 1988 Plan was environmentally superior to the current Plan.

Hollywood Heritage acknowledges that the Community Plan is a general framework. We advocate for clarity and direction for anyone involved in land use decisions, including city leaders and staff; developers and property owners; and community organizations and residents. Therefore, our interest in land use issues in Hollywood is substantial.

**Language in the DEIR including Land Use and Zoning proposals are inconsistent with portions of the Draft Community Plan Text.** The Draft Community Plan text implies the opposite of the EIR. There is a robust, engaging chapter focused on the history of Hollywood, stating goals for preservation, with policies to identify and protect the priceless cultural treasures of Hollywood .

That “Preservation” chapter outlines policies to meet the goal to “Honor Hollywood’s legacy through the preservation of the built environment that reflects Hollywood’s cultural, social, economic, and architectural history.” The policies are developed later in the document into implementation measures, to identify and protect historic buildings through various studies, City Planning activities, etc. These are to be achieved sometime in the future. These “Implementation” measures are of course the foundation for EIR mitigation measures, of which there are none in the EIR.

**The Land Use Plan is the part of the HPCU which will be adopted by ordinance.** The only part which will be adopted and turned into a city ordinance is the Land Use Plan with the proposed zoning. The principal cause of the loss of Hollywood’s cultural heritage is new real estate development, which is generally incentivized by a higher density zoning overlain on existing neighborhoods or areas of lesser average density.

- The 1988 Community Plan (the current Community Plan) had conflicts between existing buildings and proposed zoning, creating a constant pressure for demolition. A central task for this Community Plan Update was to identify, map, quantify, and understand those conflicts, prior to beginning the process of assigning new densities. While the new changes in 2018 are partially mapped in the DEIR, no comprehensive conflict mapping was done to show the current situation. Because the DEIR mapping was prepared years after the Land Use Plan, action needs to be taken in the Land Use Plan to ameliorate the conflicts once they are clearly shown in the corrected FEIR,
- This 2018 proposed Land Use Plan entails 69 subareas of upzoning. A central task of this proposed plan was to identify, map, quantify, and understand where proposing this higher building density overlaps with historic building or neighborhoods. Maps were created, but the results shown on those maps are not analyzed or discussed in the EIR. Most importantly, there are no mitigations to minimize the identified impacts.
- Attached to this letter are examples of the failure to analyze the issue prior to proposing an upzoned plan and concluding that the adverse effect – the loss of cultural treasures – was unavoidable.
- A zoning designation of CPIO is in the Land Use Plan attached to all parcels in the CRA (Redevelopment Plan) area of Central Hollywood. That CPIO requires alterations to commercial properties which are “designated” to be reviewed by the City for Federal, State and City historic resources but fails otherwise to protect, notify, limit, or otherwise prevent demolition or alteration to other eligible properties contained in the definition of a historic resource. The protections in the CPIO should apply to all property types. Compared to the extensive mitigations currently in place in Hollywood, this is a mystifying result.

**FEIR Actions Needed:** The current DEIR identifies and maps hundreds of historic resources which as a whole tell the story of Hollywood’s built environment. The issue of planning for the retention of these resources, however, is the necessary action. In other words, the EIR does not stand alone – its data must be integrated into the Plan, and all feasible mitigations utilized. Step one is the mapping and analysis noted above, and step two is re-examining and working on the Land Use Plan. This cannot and should not be overlooked in the FEIR, which may involve considerable planning effort.

City Planning has stated that one of the major goals of this Plan is to address historic preservation. However, previously articulated allowable densities, discretionary actions, and entitlements have not supported this. The current plan continues to:

1. Incentivize demolition by granting excess densities over Practical Buildout.
2. Defeat the rationale built into the current Community Plan (1988) for historic buildings incentives, including Transfer of Development Rights.
3. Create inequality among properties and unfairly punish historic property owners.
4. Promote abandonment, lack of maintenance, and speculation leading to disinvestment in neighborhoods.

**Preservation Chapter of Plan Text:** The inclusion of the Preservation Chapter in the Plan Text is a great step forward for Los Angeles. The next step, as noted above, is integration of the DEIR findings into the Land Use Plan, so that the aspirations expressed in the Preservation Chapter are accurate. Hollywood Heritage recognizes that the mandatory Elements of the update, such as Land Use, Conservation, Transportation, etc. must be internally consistent by law, and also points out that they need to address inconsistencies between the built environment and contemplated plan. Many projects have received discretionary actions in recent years which double or quadruple the densities put forth in this 2018 Plan, creating urban design inconsistencies and uncounted effects.

Previously approved discretionary actions have made zoning and height limits so un-planned that they threaten historic resources. This Plan's building envelopes are so generous it simply makes a bad situation worse. . Therefore, there is no need for developers to use incentives, such as Transfer of Floor Area Rights, the Mills Act, federal investment tax credits, easements, etc. The current situation fully incentivizes demolitions and incompatible new construction. Sadly, the language in the Preservation chapter and its policies do make an attempt to resolve some of this, but the accompanying DEIR lacks implementation or mitigation.

**The DEIR Land Use section is inadequate.** The Land Use Chapter of the DEIR, in particular, must unambiguously and proactively address preservation goals integrally, as a separate preservation element would. The addition of the Preservation Chapter in the Plan update does provide verbiage about the importance of historic resources in the Plan, and put forth policies to give a future partial roadmap to implementation of how resources could be protected. However, lack of thorough integration of historic buildings into the Land Use Plan and DEIR now leads to the unacceptable DEIR conclusion of significant adverse effect without feasible mitigation measures. This makes the Plan and the DEIR inadequate.

Note that one important tool could be that the proposed demolition of any building 50 years old or older should be tied to an approved building project to discourage unnecessary demolition. Hollywood Heritage supports the language of the Vermont/Western Transit Oriented District Specific Plan as a model for this.

Hollywood Heritage acknowledges that historic preservation has been referenced throughout the Plan and that there are policies formulated which could lead to protecting the majority of resources. However, the language in the Land Use chapter of the Plan and the DEIR continues to override any other references to preservation and the fact that there are no implementation (mitigation) procedures renders the argument that resources are protected moot.

- **Land Use Element:** As noted above, historic preservation is not a mandated element in a Community Plan, but Conservation is. Other state policies provide careful reasoning as to why preservation planning should be included in Community Plans: in particular, State Health and Safety provisions and OHP's own planning guidelines provide guidance on this issue. Of particular concern is the discrepancies between height districts and contemplated zone changes which will result in demolition of extant resources.
- **Plan Implementation:** Recommended Zones, Height Districts, and other Plan features should be consistent with the retention and rehabilitation of identified resources. For example, many neighborhoods identified in the CRA 2010 Historic Resources Survey are zoned so that extant resources are at risk. Hollywood Heritage supports the comments of the Sunset Square and Spaulding Square neighborhoods in their NOP comment letter regarding the commercial streetscape on Sunset which the two communities share:

The Plan needs to reflect the zoning meant to protect the Sunset Boulevard historic neighborhood commercial zone between La Brea Avenue and Crescent Heights Boulevard and keep the zoning along Sunset compatible with this low-density district that

abuts single-family and low-rise multi-family housing to the north and south. A change in zoning to C1-1XL with a 30 foot height limit is needed from Stanley to Vista along Sunset, reflecting the zoning along Sunset from Fairfax to Stanley. This low-density commercial zoning needs to be extended from Vista east to La Brea and from Fairfax to Crescent Heights. This is but one example of the kind of thoughtful planning needed in the CPA.

- Plan Text: The Goals, Objectives, Land Use, and Implementation sections of the draft text need to be consistent. Several previous goals and objectives addressed historic preservation and retention of resources, while others directly contradict the stated purpose. Again, our 2012 conversations were a start in rectifying these inconsistencies.

### **How the DEIR responds to Hollywood Heritage's NOP comments:**

In our NOP comments we noted that the purpose of CEQA is 1) to identify historic resources extant in the area and 2) to analyze the impact of land use decisions on the extant built environment. The current draft language does highlight adverse effects to historic resources. Hollywood Heritage acknowledges that there will be significant adverse impacts to any individual property identified as a historic resource if the project includes demolition or substantial alteration.

However, that is not an excuse to not do everything you can to protect the whole population. The story of Hollywood is contained in its collection of historic resources with all its myriad component parts. Definitive identification of resources and more robust mitigation to protect those resources should result in lessening adverse effects. Clear language on how the plan will be implemented and the evaluation of those procedures needs to be included. Our NOP comments highlighted the following areas of concern. The Community Plan Update and Draft EIR have addressed some of the issues and yet inexplicably have ignored many of the most important issues.

**Item 1:** The Cultural Resources section of the Draft EIR has identified what constitutes a historic resource for the purposes of the plan (on page 4.5-43 the DEIR identifies historical resources as including "all resources on the California Register (which include those on the NR; all HCMs; all HPOZs; all resources identified in the survey that meets the standards of the PRC Section 5024.1(g), including SurveyLA; and resources identified in the CRA survey as eligible for listing or designated on a register). The Cultural Resources section contains a description of this population and maps which depict them. While, the maps are a good identification tool Hollywood Heritage has identified several discrepancies in how resources and groups of resources are depicted, which need to be rectified prior to Final EIR. Currently the maps, particularly figures 4.5-1 do not include district boundaries from the 2010 CRA survey, are missing at least one 2010 Survey district and mischaracterized one identified district as designated and do not appear to include district contributors as well as individually significant contributors. Hollywood Heritage would be pleased to meet with the department in an effort to rectify the data on these maps.

Appendix L is meant to be "Designated Resources in the Hollywood CPA." However, HCMs which are all designated resources are missing from this list although there is a separate list on 4.5-26. This is confusing to the public. Appendix L does not appear to contain the eligible resources identified as part of SurveyLA and the 2010 CRA survey, those eligible resources however, are included on page 4.5-26. The final EIR should rectify these discrepancies so that the public has a clear picture of the extent of the designated and eligible resources and how they are located either individually or in districts. Please clarify the 2012 HRI was one of the sources for Appendix L. Hollywood Heritage stands ready to help in clarifying these lists so that the public has an accurate description of the breadth and depth of resources in Hollywood.

The Draft EIR for the Hollywood Community Plan Update (HPCU) concludes that the proposed Land Use Plan will result in significant, unavoidable adverse effects on historic buildings. The EIR carefully identifies the buildings:

- Federally significant buildings (National Register buildings and Districts, including the Hollywood Boulevard Commercial and Entertainment District listed at the national level of significance);
- City-identified buildings CHMs (Cultural Heritage Monuments) and HPOZs (Historic Preservation Overlay Zones); and
- CRA-identified buildings and districts (significant structures in central Hollywood, in the Redevelopment area.)

The DEIR identifies and maps historic buildings throughout Hollywood but concludes there isn't anything to be done to keep them standing—not a single mitigation.

- The DEIR states in Sec 5.2 that a Primary Objective of the Plan is “protect historic and cultural resources”.
- The DEI states in Sec 5.3 under that “after implementation of all feasible implementation measures”, the effect on Cultural Resources: Historical Resources is “significant and unavoidable.”

**Item 2:** In its NOP comments Hollywood Heritage stated that the preparation of “conflict maps” was essential to understanding the contemplated impacts of historic resources. These maps can be prepared by overlaying the historic resource maps in the draft with the proposed zoning and land use maps. Such a tool is a simple way for the public to understand the order of magnitude of significant impacts on historic resources without mitigation. While some of the upzoning in the Plan is included in the maps, that upzoning is not clearly identified on the maps as such and reflects only the updates of the current plan, but not the extent of the conflicts between extant historic resources and contemplated zoning.

Conflict Mapping is extraordinarily important to the most significant resource in the Community Plan Area; the Hollywood Boulevard Commercial and Entertainment District, listed in the National Register of Historic Places at the National Level of Significance. This collection of over 100 buildings which tells the story of the commercial development of Hollywood during its golden era has been zoned regional commercial, the highest level of zoning used in the plan and one completely inappropriate for the scale of buildings that form the district. should regional zoning be implemented without processes and design guidelines to ensure the protection of this district, the city will be responsible for the eradication of one of the most important historic districts in the United States.

**Item 3:** The EIR does identify thresholds used to determine adverse effect and rightly concludes that impacts to historic resources are significant and unavoidable. This is true on a per project basis where any individual resource may be adversely impacted through demolition or alteration. It may actually be true on a plan wide basis if no mitigation measures are proposed to lessen the effect of the stated land use policies. So, although the plan itself will have adverse effects on historic resources unless mitigated, there is no reason not to list feasible mitigations which will lessen the impact.

**Item 4:** Although requested, there appears to be no alternative to wholesale demolition of historic resources identified in the plan. This omission is unacceptable. There is a readily available alternative, which could be based on reconciling the growth projections from SCAG with locations where growth might occur without destroying historic buildings. That alternative is needed and obvious.

If a new alternative is not developed, the No Development Alternative is environmentally superior: The “No Development” Alternative is actually simply a continuation of the current 1988 Community Plan. A quick read of that Plan demonstrates that the housing and commercial capacity for the year 2040 of that 1988 Plan is already DOUBLE what is needed. It better concentrates density near transit. The Plan had a

practical buildout for a population of 46,000 more people than expected under the current 2040 population projections. The figures used to support the No Project Alternative fail on many bases — they don't take into consideration the vast amount of housing construction allowed and happening on commercial land; SB1818 and TOC incentives which currently apply and overlay the 1988 Plan; etc. If the 1988 Community Plan is kept in place, and simply some detailed zoning restrictions furthering better community design and resource protection are developed, Hollywood will have a far more sustainable and economically viable future.

**Item 5:** The city has chosen not to include feasible mitigation measures which could result in the protection of hundreds of historic resources in the Plan. This is unconscionable. For when the plan does apply to historic structures, specific mitigation measures are needed—many of which are currently the clear responsibility of CRA, but in the future that can be conducted and monitored by the Office of Historic Resources. Hollywood Heritage requests that precise language regarding process and review of projects, clarifying these among many mitigation measures possible for historic resources and adjacent properties, be included in the Community Plan.

The CPIO proposes using the Secretary of the Interior Standards as a mitigation to apply to some projects and some resources. This is already a requirement applying to City-designated properties, and applying to all CRA-identified properties. So in order to assure the continuing quality of our historic resources and to lessen the need for new design guidelines for Hollywood, the Secretary of the Interior Standards and Guidelines should be the standard for ALL rehabilitation and new construction in the CPIO.

Adherence to the Standards would also avoid significant and negative impacts under CEQA. As an example, Hollywood Boulevard is increasingly fragile, and cannot withstand alteration to its contributors or non-contributors without a review based on the Secretary of the Interior Standards. It is understood that the use of the standards may be thought of as a policy or project feature, but they can also be used as a mitigation measure that can be monitored throughout the life of the plan.

The use of CRA urban design plans and other documents will also provide future mitigation for historic resources within the CPIO boundary. The CPIO for the former redevelopment area is a good tool, but one which requires much more definition for scope and accuracy. The processes and guidelines should apply to all types of properties within the area, residential, commercial, and institutional. There should be no demolition of historic resources without an approved project, a mitigation measure which is already in place in other Southern California cities like West Hollywood. Another example of successful mitigation could be the adoption of incentives for property owners of rent stabilized historic structures similar to the program in West Hollywood.

Hollywood Heritage acknowledges that the text of the Plan identifies several policies which could be turned into implementation tools and therefore could be used as mitigation measures.

**Item 6:** Another feasible mitigation measure would be the re-branding of the Preservation Chapter as a clear Preservation Element to answer questions of policy and provide implementation strategies. Santa Monica's recent Downtown Plan incorporates such statements. Hollywood Heritage has material from Santa Monica and other places which could be used to create such an element and feasibly mitigate wholesale demolition and alteration of historic resources.

### **Conclusion:**

This Community Plan was touted as the opportunity to plan for a resurgence of historic Hollywood, but in reality, has sadly devolved—by keeping the 2012 Land Use approach and failing to ingrate historic

buildings into land use planning—to yield the most significant and irreversible loss of the historic built environment, most of which currently exists in high concentrations around the transit nodes. Thus, it is planning for an intense adverse effect for historic resources in the exact areas that the city is wanting the most change to accommodate a small growth in percentages that has not been addressed. This is the single most important issue facing Hollywood, it has been solved in many other cities. The disconnect must be correct.

Many options are included in our letter, and our experience and those of our preservation colleagues in many other cities can help to quickly remedy the shortcomings of the Land Use Plan. We need to encourage sustainable adaptive reuse of the existing historic built environment around transit nodes by developing or modifying a community plan alternative that simply will not allow demolition, makes re-investment in existing property the norm rather than speculative abandonment, has a Transfer of Development Rights, supports a healthy commercial area with adequate parking in addition to transit, makes pleasant sidewalk connections to residents to encourage them to use our Main Street (Hollywood Boulevard), keeps out of scale buildings away from walkable areas, and prevents new mega-projects from sucking commercial vitality away from existing streets. It is all possible — not just as words written on a page, but as real planning and zoning. Hollywood — internationally famous — does not need to be wiped out with our City's complicity and EIR rationalization.

In conclusion, it is important to explain the inherent conflict to the public in a transparent way, such that anyone can understand clearly, WHY the city is planning in its proposed HCPU plan to significantly and irreversibly demolish its historic resources both on an individual and cumulative basis. It is disingenuous and confusing to state that one of the primary objectives is to “protect” historic and cultural resources with regulatory language, AND at the same time plan to allow/expect the significant loss of those same resources.

Hollywood Heritage looks forward to working with CD13 and CD4 and the staff of the Planning Department, including OHR, to make the necessary changes in the Plan and Draft EIR so that the documents adequately reflect the population of historic resources and provide strong implementation and mitigation measures which will protect the vast majority of the population of historic resources.

Hollywood Heritage finds that the loss of Hollywood itself — its physical patterning, homes, and commercial areas — is avoidable, and this DEIR is deficient. The conclusion of the Draft EIR on Cultural Resources is not supportable. We find that there are many, many known and possible mitigations. We find it is only the first step to identify the resources—the required step is to plan for them. We find that the Land Use Plan has failed to make any attempt to plan for historic resources and failed to include robust mitigation measures.

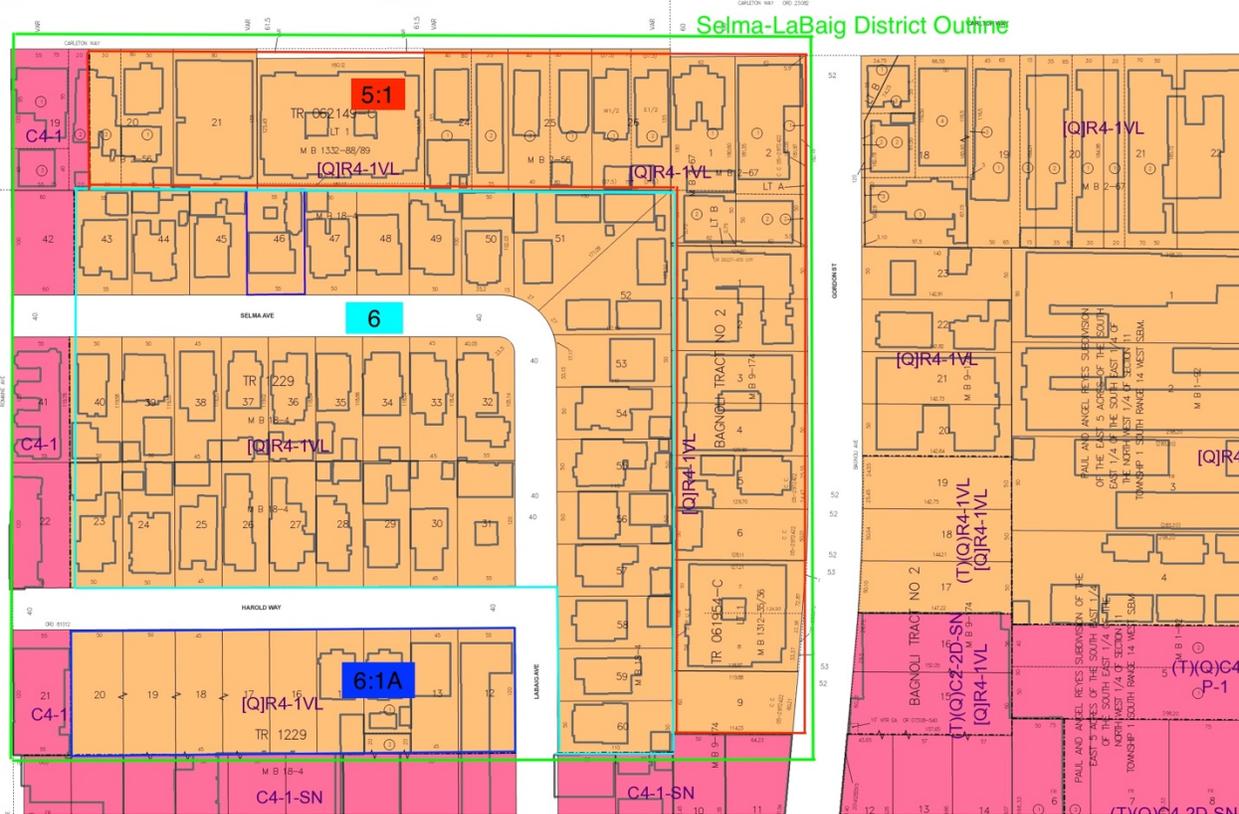
Hollywood Heritage reserves the right to further comment and to supplement these comments with further examples and/or additional findings.

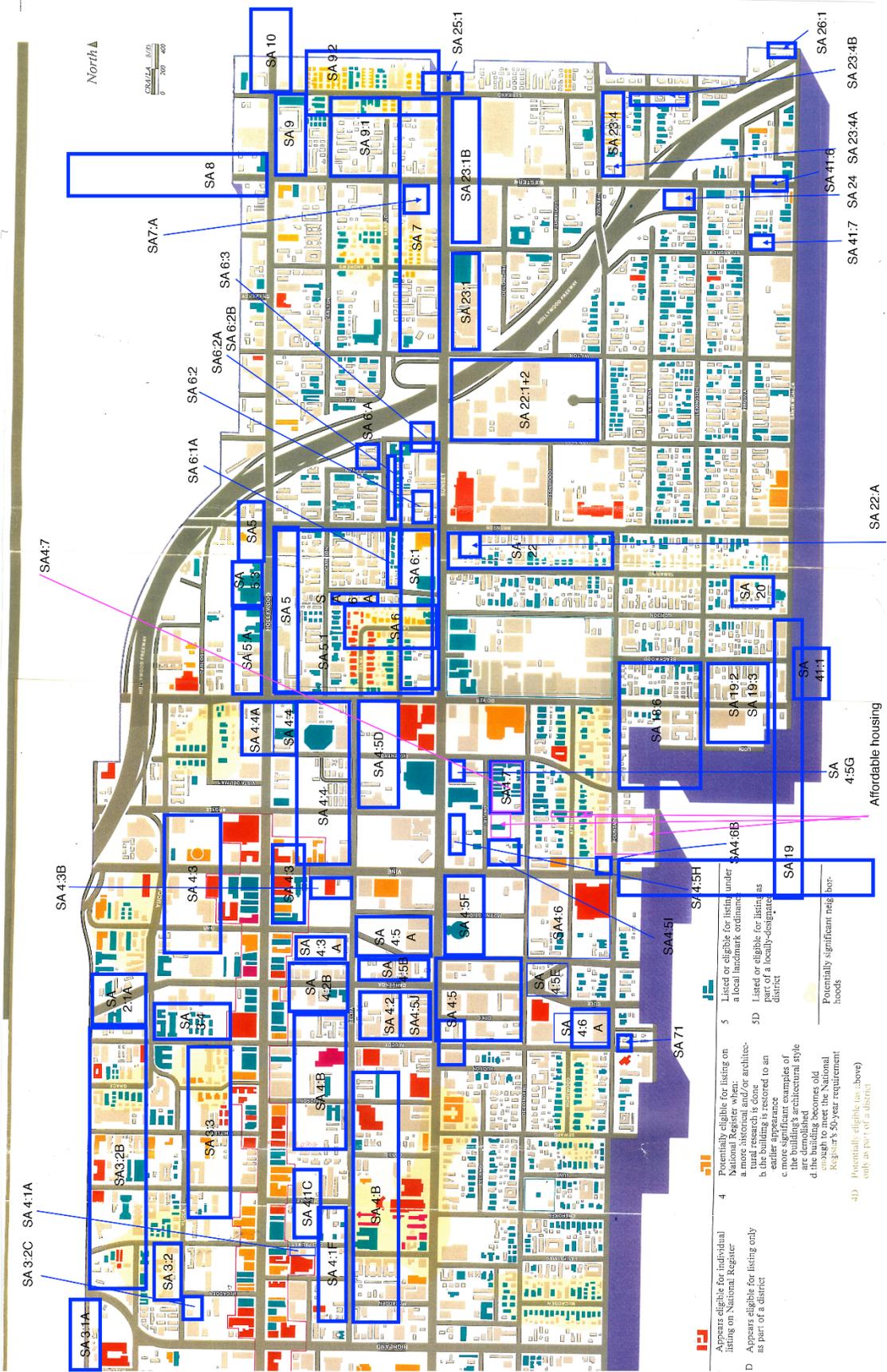
Sincerely,

A handwritten signature in cursive script that reads "Richard Adkins". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Richard Adkins  
President

5:1	High Medium Residential	High Medium Residential	[Q]R4-1VL	[Q]R4-1VL-CPIO	3	3	45	45	Promote housing development, maintain neighborhood compatibility, and protect historic resources.
	High Medium Residential	Low Medium II Residential	[Q]R4-1VL	RD2-1XL-CPIO	3	3	45	30	Maintain existing neighborhood scale. Protect identified historic resources.
5:1A	High Medium Residential, Highway Oriented Commercial	Regional Center Commercial	[Q]R4-1VL	[Q]R4-1VL-CPIO	3	3	45	45	Extend the Regional Center land use designation to incentivize development of underutilized parcels. Add pedestrian-oriented design standards. Protect identified historic resources.





- Appears eligible for individual listing on National Register
- Appears eligible for listing only as part of a district
- Potentially eligible for listing on National Register when:
  - 4 Listed or eligible for listing under a local landmark ordinance
  - 5D Listed or eligible for listing as part of a locally-designated district
- Potentially significant neighborhoods
- Potentially eligible (see above) only as part of a district

Affordable housing

SA 22:A

SA 41:7 SA 24 SA 23:4A SA 23:4B SA 41:6 SA 26:1

North  
SCALE 1/8" = 1'-0"  
0 100 200

## Communication from Public

**Name:**

**Date Submitted:** 04/19/2023 08:21 PM

**Council File No:** 21-0934

**Comments for Public Posting:** Attached you will find Hollywood Heritage Hollywood Community Plan Update comments dated 20210214 submitted for inclusion as required as a part of the HCPU EIR process and the City Planning Commission review. As this document does not seem to be a part of the Council File, please include this copy in the Council File.



**HOLLYWOOD HERITAGE, INC.**  
**P.O. Box 2586**  
**Hollywood, CA 90078**  
**(323) 874-4005 • FAX (323) 465-5993**

February 14, 2021

City Planning Commissioners  
Mr Craig Weber and Ms. Linda Lou,  
**Email: [linda.lou@lacity.org](mailto:linda.lou@lacity.org)**  
**Email: [cpc@lacity.org](mailto:cpc@lacity.org)**

**RE: Item CPC 2016-1450-CPU**  
**Hollywood Community Plan Update February 2021- Planning Commission**

Dear Commissioners:

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members thank you for the opportunity to review and comment the Hollywood Community Plan Update, released February 5 for your February 18, 2021 hearing.

**The promise and necessary improvements in the Hollywood Community Plan Update.** The promise of this Hollywood Community Plan has been that years of investment in professional historic ‘survey’ work have delivered! We, and you, know where and what the significant landmarks of Hollywood are. The planning work that supports restoring those landmarks, and using them to launch an attractive, sustainable, economically thriving Hollywood, is one that integrates historic buildings into Community Planning.

**What is hiding in the proposed Community Plan that is surprisingly problematic?**

- Why is Grauman’s Chinese Theatre in the Plan’s zoning with incentives for high density housing? Why is our commercial “main street” so dismally behind other locales such as Pasadena, Santa Monica, Larchmont—and even Culver City? Why is Yamashiro shown as commercial land, and its rezoning for massive development hidden in a footnote? Why does the Plan have an Implementation section suggesting important great tools for Hollywood, while the Ordinance in Exhibit I asks the Commission to vote to repeal those very same good ideas which are already in our law? Why is highest density in the City piled on already dense congested central Hollywood, with massive projects entitled, while 3 other Metro stops with far more opportunity are left sleeping?

- Why are the few remaining intact central Hollywood neighborhoods shown as being “preserved” (“character residential”), while the Plan proposes that the zoning already on them—already 6 houses on a lot—be further increased by 40% (Exhibit D CPIO) rather than showing how to realistically keep these intact historic homes, maybe with some units on the back? Why are major landmark churches showing as opportunity sites for high density new buildings?

The challenge is that this is the first time a Community Plan in Los Angeles has attempted a Community Plan Preservation Element. Downtown Los Angeles has had its Downtown Design Guidelines. Nothing is perfect, but the Planning Department adoption of those Guidelines was a milestone for LA.

- Unfortunately there is ONE part of this Community Plan that gets adopted by our City Council—the Zoning Ordinances for every land parcel. Unfortunately it has not been mapped or shown to the public. Unfortunately the necessary protective or inventive zoning that brings preservation success in other cities has not been done yet.
- Councilman O’Farrell requested a Preservation Element for this Plan. “Elements” of Community Plans are required by State law to be integrated and consistent each with the other, so traffic, water and sewer, etc. are consistent with the proposed Land Use/zoning and vice versa.
- But in our HPCU Plan text the history that made Hollywood famous is recounted in a promising start on a Preservation Element. But it devolved into a “Chapter” of the Plan text, recounting current City Planning activities, and stopping before fully identifying where the landmarks are, what unique features, challenges or opportunities they might pose, and without integrating them into the proposed zoning .

There are initiatives in the Plan that are carefully developed –like the TDR draft and the Character Residential design guidelines draft in the August 2020 version. That degree of detail, specificity, and expertise applied throughout the Plan can lead to a significantly better result.

**What is needed from the Planning Commission?** How can we reboot this effort and make a win-win with preservation, and prompt a new Hollywood renaissance? The Planning Commission must send this back to the Planning Department, or require that prior to forwarding to PLUM, these items are corrected.

**TAKEAWAY #1: Remove the CPIO upzoning incentives from Hollywood Boulevard and the Character Residential Districts**

The Plan and CPIO speak soothingly about preservation. The proposed CPIO puts a direct bullseye on our commercial main street and historic neighborhoods-- our theatres, galleries, Jimmy Kimmel, the Academy Awards. Hollywood heritage has prepared case studies with local developers showing the genuine results of the well-intentioned CPIO—it is quite opposite of what is intended.

The CPIO creates an unneeded artificially-created conflict in a limited land area. It is unnecessary and should be removed.

- Remove the upzoning incentives to tear down Grauman’s . ( It already was zoned in 1988 at twice the density of Century City, and the CPIO raises it more..)
- Calculate actual Plan capacity under the 1988 Community plan first. Remove the artificial and unnecessary conflict created by this Plan by pitting historic building against affordable housing.

- Find opportunities for incentivizing demolition and new development near OTHER Metro stations. Use the map of historic buildings as a guide to where NOT to incentivize upzoning.
- Be clear that historic buildings will remain- so they are invested in, not abandoned. Pasadena made the first line in their Colorado Boulevard Plan when they transferred Redevelopment 30 years ago “there will be no historic building demolished” . The area surged into a fabulous tourist, regional, and local attraction.
- Let Hollywood Boulevard finally escape the stranglehold of land speculation. Other cities figure out how to pour investment into the fabulous buildings they have—same age--, restoring them, amazing the public.
- Reverse the current trend of disinvestment, emptying buildings, partial demolition, short leases, etc,.
- Validate parking in City lots.
- Allow housing in upper floors of existing historic buildings.
- Extend HPOZ mechanisms to State and Nationally -listed historic Districts to achieve an equal level of treatment to HPOZs.
- Extend HPOZ treatment of non-contributors and follow the Niles decision on the effects of new construction on historic districts

**Hold public hearings for this newly issued CPIO:** Cambridge Mass worked with the public for 3 years on detailed design standards to ameliorate the effects on existing neighborhoods before enacting their affordable housing incentive ordinance. This CPIO rolled out first in August 2020, held one Zoom meeting in which we participated, and issued revisions 10 days ago with no tracking changes. Either the CPIO calculates actual quantities created by this incentive system and does conflict mapping with historic buildings and avoids them—or it should not go forward at all.

**TAKEAWAY #2: Reject the counterproductive, unexplained, and damaging Ordinance in Exhibit I, which repeals from existing law the same provisions that this Plan quixotically says need to be implemented**

A new Ordinance, in Exhibit I, asks you to repeal ALL of the historic protections and incentives from the last 34 years that were law in central Hollywood. These transferred Nov 7, 2019 from the Community Redevelopment Agency (CRA) to the City. These were mandatory parts of the Hollywood redevelopment Plan (HRP)

- The following provisions the Plan text “Implementation” Chapter. These are the centerpiece proposals for the future implementation of historic preservation for the HPCU Section 5 and 7. Quixotically these the same provisions the Planning Commission is asked to repeal by forwarding Exhibit I. Some examples:
  - Design review for every project and permit existing prior to SB330: (HRP\_Sec 407.1.4, Sec 505.1)
  - P28: “Ensure that the character of historic neighborhoods are maintained .. by providing review of new development within historic neighborhoods” (HRP Sec 505)
  - P35: “..use the Secretary of the Interior Standards” —( HRP Sec 409) Establish zoning regulations to ensure appropriate review of design for resources. Removing this section demotes the most significant landmarks: “Any development project which involves designated historical resources, including City of Los Angeles Historic-Cultural Monuments, shall conform with the Secretary of Interior’s Standards for Rehabilitation”

- P38: “protect designated and eligible historical buildings in the Regional Center”— (HRP Sec 511) Removing this section removes the listing and inventory requirement for nearly 900 buildings; a 180 day delay of demolition provision equivalent to that for City Historic Cultural Monuments; etc
- P38: Hollywood Boulevard and Sunset Boulevard Plans (*sic*- was ‘Hollywood Core Transition District Plan’)- removing this section removes the best chance for Hollywood to recover as a Main Street district- plan required by CRA and prepared numerous times (HRP Sec 506,2,1 and 518.2 HRP )
- P39: showing under “complementary design) for new infill in historic districts and “matches the scale”
- P40: For height limits to limit commercial heights adjacent to historic neighborhoods “Any development project which involves designated historical resources, including City of Los Angeles Historic-Cultural Monuments, shall conform with the Secretary of Interior’s Standards for Rehabilitation (HRP Sec 506.2.2 )
- P41: documentation: “Support and complete HistoricPlacesLA on-line” . All of the properties identified by the CRA are not integrated-
- P70-76: Parking and traffic programs to support businesses in existing buildings mandated for CRA—having been done well – (HRP Sec 506 and 518)
- Action items to clarify the impetus behind this ordinance
  - *Hold public hearings on eliminating any section of the Redevelopment Plan. Fully analyze effects*
  - *Clarify what will happen with the Redevelopment Unit’s permit processing in Hollywood if the Community plan successfully replaces every requirement of the redevelopment plan in the HPCU when adopted*
  - *Clarify City’s proposal regarding fees which were assessed by the CRA transfer to City planning*

### **TAKEAWAY #3: *Save Hollywood Boulevard***

Hollywood Boulevard is one of only a few districts in the nation listed at the national level of significance in the National Register of Historic Places. This HPCU, CPIO, and Ordinance Exhibit I asks you to roll back the clock drastically, to treat it as vacant land, to lose the untapped potential, to forgo the excellence hidden under bad remuddlings-- to lose it unnecessarily.

Santa Barbara, Santa Monica, Pasadena took their historic districts as a “a goose that laid a golden egg” 30 years ago. They used what can be called a “Main Street” approach, well known for making thriving districts, attractive to tourists and residents alike. Their springboard was historic buildings- restored. Hollywood has promoted Times Square -ish new construction. Successful specialty retail and entertainment locales must be attractive first to locals.

- Ingredients that make a successful Main Street use well known ingredients. First and foremost is a quality Urban Design Plan, integrated with traffic management (curbs, loading, delivery, drop off) and coordinated validated parking; economic restructuring; organization for safety and security; coordinated image and marketing.

- Hollywood Boulevard has underlying zoning from the 1988 Plan that was excessive at the two ends—from La Brea to Las Palmas, and from Cahuenga to Argyle. Larger and taller buildings were historically there, where cross-mountain roads passed through Hollywood.
- *Action items:*
  - a. *CPIO upzoning affordable housing incentives are inappropriate along Hollywood Boulevard. Adaptive re-use is more appropriate.*
  - b. *Identify and remove zoning code impediments to reuse of existing commercial building upper floors*
  - c. *Every building within the National Register boundary line must be protected by discretionary review. Altered contributors must be investigated—as many buildings have their facades covered up but extant. Non contributors must be remodeled, or if replaced designed, to be compatible with the historic district—following the Secretary of the Interior Standards, with Preservation Brief #14 elucidating Standard #9, and with design complying with the Niles decision.*
  - d. *Hollywood Heritage can provide City Planning with case studies. We have studied how to achieve needed improvements to the buildings using the rubric of zoning and CPIO.*
  - e. *Stop discretionary zoning actions allowing projects 2-5 times what zoning allows—that incentivize vacant and mothballed buildings*
  - f. *Use all known and possible existing building devices to keep them standing: -- in-lieu parking; validated parking district; adaptive re-use automatic variances; seismic bond funding; community assistance bureau for building repairs*
  - g. *Stop mythologizing that new construction is a rising tide to lift all boats. It hasn't worked.*
  - h. *Keep existing buildings by adaptive re-use*

**TAKEAWAY #4 : Work out the needed Mitigation Measures for Cultural Resources necessary, or revise the zoning, so that the EIR does not allow avoidable adverse significant impacts on historic buildings.**

The EIR issued to you by City Planning says outright that this Plan has “unavoidable” significant adverse impacts on our historic buildings. This is simply untrue. Adverse impacts are avoidable – they are created by the Plan, and the plan has changed constantly and can change more to avoid them.

- How do we know unequivocally that these impacts can be avoided? First, they are created mostly by this new Plan—some from the 1988 Plan. The Plan’s proposed zoning must be overlain on the mapping of historic resources, and the conflicts identified, and avoided.
- Secondly, CRA had procedures and formal Mitigation Measures for 34 years. In their EIR CRA’s massive Regional Center density—second densest in the City—they planned sufficiently (not perfectly at all) to mitigate the impacts.
- A Statement of Overriding Consideration to bulldoze Hollywood simply will not be true. The Plan and the EIR have done none of the underlying Plan capacity calculations and other calculations which can justify a Statement of Overriding Consideration. The entire Community Plan Area south of Franklin is stated to be a potential locus for the Plan’s re-zoning, yet the highly concentrated upzoning is proposed all in the highest density areas already, and on top of the greatest concentration of historic buildings. There is no justification...

- The CPIO makes untenable statements about “automatic” CEQA clearances that must be removed.

Don't kill the goose that laid the golden egg. *Action items include*

- *Resolve the conflicts --in the zoning. Once the location of identified resources is mapped, a “conflict map” can be prepared using information regarding existing and proposed zoning and land use projects. Part of that effort should include the mapping of existing unchanged zoning/community plan against historic building and district locations.*
- *Conflict maps were prepared for the version of the Community plan on which the EIR was based. These may be available to City planning. Hollywood heritage also has GIS format maps that make this efficient.*
- *Provide the calculation of excess capacity in the current plan, adding in excess capacity for housing built and being built in commercial zones, excess housing allowed under State ADU ordinance and City TOC ordinance etc. Accurately count housing already entitled against the 2040 SCAG goals,*
- *Compare to SCAG projections, and adjust all zoning recommendations as necessary.*
- *Adopt clear mitigation measures*
- *Conclude which EIR Alternative is environmentally superior based on evidence and data.*
- *Redefine “eligible resources” Community-plan wide.*
- *Change definition of prohibition of demolition of Receiver sites to include the entire ARG survey as corrected*
- *Transfer of Development Rights should not be limited to Regional Center- the California Register and other districts and individual resources throughout Hollywood should be able to use this tool (P 15 CPIO)*
  - *Do not treat nationally and state-recognized landmarks with any reduction of oversight from OHR compared to local HCMs and HPOZs.*
  - *Do not change definitions in national and state districts – it is simply not within local authority to redefine some buildings as NOT an “eligible resource” that are within district boundaries established by superior jurisdictions.*

**TAKEAWAY #5: Hollywood has the highest concentration of historic resources in LA after Downtown in Los Angeles. The greenest building is one that already exists. Work with OHR and preservation organizations to accurately identify and map the important historic buildings, and make the Plan Implementation section robust, building from “best practices”**

It takes the planet 30 years to recover from a building's demolition.

The HPCU can have accuracy on the location of historic buildings, and must be mapped and publicly available.. 30 years of work by arms length experts has established where Hollywood's historic buildings are. *Action items are:*

- *Share the new and corrected EIR mapping with preservation organizations and the public NOW--prior to any further hearings . Small district boundary adjustments, etc are needed in the interest of precision*
- *Plan Footnotes state 5. “The Cultural/Historic sites mapped are representative of publicly accessible sites but there is a comprehensive list of historic resources maintained by the*

*Office of Historic Resources.” This is wholly unacceptable. Map all historic buildings and districts accurately HHI has prepared all the mapping in GIS format for the City*

- *Adopt the 511 list*
- *Clearly identify where an historic area has been subsumed under a CPIO category, which process alterations, additions, and new construction will follow—OHR or CPIO development standards or both.*
- *Revise the map prepared by City Planning showing opportunity sites for housing- remove churches, landmarks, etc. be more precise.*
- *Require all new building projects to prepare carbon budgets and ameliorate greenhouse gas emissions on site*

Hollywood Heritage can assist in the following Implementation items mentioned in the HPCU Plan Text. However, a number of these items must precede Plan adoption:

- Suggested in the Plan text :
  - P68: Work with preservation organizations
  - P39: for Land Use and Zoning : “Maintain appropriate General Plan Land Use designations and zoning in historic districts which are either listed in or eligible for “ the National Register (sic)” .Must be done now.
  - P129: Encourage neighborhood uses such as high quality shops—can not happen against the background of speculation
- Suggested in the Plan but already exist
  - P33: “Study” Transfer of Development Rights—this is in the CPIO but not developed properly
  - P66: Hollywood Walk of Fame Treatment Plan (not being utilized)
  - P130: Study design standards for sidewalk dining element along the Hollywood Walk of Fame (see CD 13 heart of Hollywood Initiative)
- Suggested in the Plan but not a good idea:
  - P36: For ensuring “complementary design” utilize Citywide Design Guidelines for new and infill development. (These guidelines are imprecise for the detailed conditions, not tailored to Hollywood’s specific characteristics; fail to utilize Preservation Brief #14 to interpret Standard #9, and fail to comply with the Niles decision regarding historic district infill. )

Preservation matters. In Los Angeles historic buildings occupy 6.2% of our total land parcels, leaving 93.8% available for new development and much-needed housing. There is plenty of room to grow. Less than 1% of growth per year anticipated means 995 of the community is already here. All deserve consideration. All citizens can equally share in culture and local heritage through our historic buildings. Historic preservation is not the province of elitists-- 21 of 35 LA HPOZs have a greater share of racial diversity than the rest of the city. Between 1999 and 2019 LA created over 12,000 new housing units through adaptive re-use of historic buildings.

**About Hollywood Heritage, Inc.** For three decades Hollywood Heritage has been the central advocate for preservation and protection of Hollywood’s irreplaceable historic resources. We preserve what is most significant in Hollywood, honing in now on Hollywood Boulevard; but we support responsible new and infill development. Our organization nominated many of the current Historic Cultural Monuments and assisted neighborhoods with their HPOZs; listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance; provided technical assistance to countless developers and owners of significant properties; invested in buildings and

restorations to trigger Hollywood's recovery; and participated in a fruitful cooperation with City Planning and Council Offices over the years on public policy, and on actions with the Hollywood CRA for 34 years. Our efforts have resulted in the rehabilitation of countless significant landmarks and districts in Hollywood. Our future challenge is acute.

We have attached to our comments an excerpt from the extensive comments we provided previously on the proposed CPIO.

Hollywood Heritage looks forward to working with CD13, CD4, and CD 5 and the staff of the Planning Department, including OHR, to bring the marvelous goals of the Community plan to fruition.

Sincerely,



Richard Adkins  
President

Community Plan Exhibits being issued Feb 5, 2021, dated February 2021

- CPC Staff Recommendation Report
- EXHIBIT A: Draft Resolution to certify the EIR, Adopt EIR Findings, a Statement of Overriding Considerations, and Adopt a Mitigation Monitoring program.
- EXHIBIT B: Draft Community Plan
- EXHIBIT C: Proposed and Existing General Plan Land Use and Framework Maps, and Proposed Change to Chapter 1 of the Framework Element
- EXHIBIT D: Proposed Community Plan Implementation Overlay (CPIO) District Map and Ordinance
- EXHIBIT E: Proposed General Plan Land Use and Zone Change Maps and Matrices; Street and Network Reclassifications; Circulation Map; Symbols; Footnotes; and Corresponding Zone-Land Use Nomenclature Changes
- EXHIBIT F: SNAP change – Proposed Vermont/Western Transit Oriented District Station Neighborhood Area Plan (SNAP) Amendment
- EXHIBIT G: Proposed Hillside Construction Regulation (HCR) District EXHIBIT H: Draft Environmental Impact Report (DEIR) and Appendices; Partially Recirculated Draft Environmental Impact Report (RDEIR) and Appendices
- EXHIBIT I: “clarify the relationship “to the Redevelopment Plan

## **ATTACHMENT #4**

### **HOLLYWOOD HERITAGE**

#### **Definition/Review of Historic Resources within Hollywood Redevelopment Area**

#### **Summary of Peer Review required from Hollywood Heritage** (Detailed excel spread sheets and GIS format maps available)

**Moving forward from the HPCU DEIR:** The Hollywood Community Plan Update and the CPIO must have consistent, clear resolved identification of historic resources in the former Community Redevelopment Area. The last listing provided was Appendix L in the 2018 version of the HPCU; this was incomplete.

All of the concepts, categories, and other information presented to City Planning is backed by a detailed series of Excel spreadsheets created by Hollywood heritage, with the pertinent information on each property listed in a table. The Excel list meets the requirements of showing earlier status codes. This data has been mapped in a series of overlays which illustrate geographic proximity, level of significance, current planning information, conflicts for resolution due to zoning, etc.

One final step needed is to compare our list to Appendix L from the Community Plan EIR. This is the answer for satisfying a “publicly available list of all buildings” noted in the Plan. However, survey information is dynamic—time passes.

**“The 511 List”** is what we call the survey results from the most recent work prepared by the Redevelopment Agency and turned over to Los Angeles City Planning and uploaded in whole or part “HistoricPlacesLA.” Prepared by Architectural Resources Group, portions of it are called “ARG list” which identify known historic resources as of the beginning of 2020.

Hollywood Redevelopment definition from Section 511 has been the definition of resources, and the “list” is notably based on expert and professional surveys. The area has been surveyed and re-surveyed multiple times over its 35 years. “Buildings listed as Cultural-Historic Monuments by the City and listed in, determined or appear to be eligible for listing in the National Register of Historic Places are determined to be of architectural and/or historic significance. The Agency shall use established criteria for determining additional architectural and/or historical resources and shall maintain a publicly available list of all buildings within the Project Area which it determines to be architecturally and/or historically significant.”

In practice, these resurveys have negotiated the changes in status code definitions handed down from Sacramento, and have included buildings of status codes 1-7.

**Properties in a district – “non-contributors” must be listed in 511 list:** The CPIO goes to great pains to direct that “non-contributors” to Hollywood’s historic districts may be demolished by right and replaced. Hollywood Heritage believes this is wrong at this time—for 3 reasons:

1. Properties in historic districts are classified as individually eligible, or eligible part of a district and within its boundary (collection of resources have a unified boundary and ascribed “period of significance.”) Today district components in the Redevelopment Area are separated into “contributing” and “non-contributing” features. However, these designations are old and based on windshield surveys, and were not re-visited by experts in the ARG survey.
2. The category of “altered contributors” – used by Los Angeles HPOZ’s to recognize buildings which contribute in their massing, style, urban patterning etc to a district, and are within its boundaries but perhaps are poorly altered, is missing from the ARG Survey.
3. As well, the actual allocation of current contributors and non-contributors may have changed.

Automatic demolition of “non-contributors” skips 2 crucial steps—assessing whether there is an underlying building which can contribute (for example when facades are covered over in commercial areas), and assessing in detail the urban design characteristics in the specific part of an overall district that are pertinent so an infill buildings will be

compatible. Skipping these steps is not allowed under CEQA—as reflected in the Niles decision in California and in Preservation Brief #14, which is the accepted measure of compliance with the Secretary of the Interior Standards.

Total number of properties: 913

Total number of current non-contributors within districts: 261

**Action items/recommendations re “non-contributors”:**

1. 511 list must contain all properties within the boundaries of an identified or designated historic district built during the period of significance, including “non-contributors” Until further assessment is done and protocols aligned with the Los Angeles Historic Preservation Overlay Zone program (which allows for “altered contributors” from the period of significance and requires design review ), the proposed
2. “Altered contributors” be introduced as a “511 List” category
3. These properties be given protection under the Redevelopment Plan, Community Plan, and accompanying CPIO. Rehabilitation of contributors and non-contributors from the period of significance will result in more robust and cohesive districts and stop the erosion of the resource (“district”). Infill on parcels which contain non-contributors outside the period of significance must be reviewed for “compatibility” with existing historic construction. The Secretary of the Interior’s Standards and Guidelines for Rehabilitation shall be the authority on rehabilitation techniques and compatible new construction.

**Recommendation for “Historic Resources”** : “ HHI Proposed 511 List” which includes:

- a) Evaluation code 1, 1D and 3S, 3D: Properties listed in or identified as eligible for inclusion in the National Register of Historic Places, either as individuals or as part of a district. This includes both contributing and non-contributing properties from the identified or updated period of significance within the boundary of a district. (Non-contributors from the period of significance should have a status code 1D\*.)
  - Associated districts: Hollywood Blvd. Commercial and Entertainment District -proposed period of significance 1964; Hollywood High School Historic District; Grace-Yucca-Wilcox Multi-Family Historic District; Ivar Hill Multi-Family Residential; De Longpre Park Residential; McCadden-De Longpre-Leland Residential; Fountain Avenue Multi-Family Residential.)
- b) Evaluation code 2 and 2D: Properties identified as designated or eligible for designation for inclusion in the California Register. In a district, both contributors and noncontributors from the period of significance are a part of the 511 list. (Non-contributors from the period of significance should have a status code 2D\*.)
  - Associated districts: Selma/LaBaig; Afton/DeLongpre; Vista del Mar/Carlos; Serrano Historic District.
- c) HCMs and locally eligible ARG 5’s: Properties identified as locally eligible for listing either individually or as part of a district in the CRA update of 2019 (ARG) and those designated as Historic Cultural Monuments in the City of Los Angeles. "Eligible Historic Resources" definition in CPIO: properties identified as eligible for listing as individual historic resources on the National Register of Historic Places, or on the California Register of Historic Resources, or as contributors within a historic district that is eligible for listing at the Federal, State, or Local level (p. 5). This differs slightly from our proposed 511 list in that it does not identify “5s” in the 2019 update.
- d) Properties identified within Planning Districts identified by the 2019 update (ARG) which are from the period of significance of that district.
  - Associated districts: Cahuenga Boulevard Commercial Planning District; Hollywood Multi-family North; Santa Monica-Western Commercial Planning District
- e) HHI Multifamily district—Orange/Orchid: Properties within the 1700 blocks of Orange and Orchid identified by Hollywood Heritage as districts but not included in the 2019 CRA update.

**Public Information and the proposed 511 List**

Per our conversation, Hollywood Heritage is requesting a separate ZI to identify historic resources within the Redevelopment Area. The current ZI 2488 for the Redevelopment Area does indicate that there may be certain parcels which contain historic resources which are subject to further assessment/review, but the code is not specific to historic resources.

Morton, W. Brown, Anne E. Grimmer, and Kay D. Weeks. *The Secretary of the Interior’s Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings*. Washington, D.C.: U.S. Department of the Interior, National Park Service, Cultural Resources, Preservation Assistance Division, 1992.

## Communication from Public

**Name:**

**Date Submitted:** 04/19/2023 08:28 PM

**Council File No:** 21-0934

**Comments for Public Posting:** Submitted on behalf of Hollywood Heritage is a map of the central Hollywood redevelopment area. The “upzoning” map shows the “subareas” of the plan as red boundaries, all where upzoning is proposed, and the color filled areas show where density bonus or both is proposed. (Dated Feb 2021- only a few recommendations changed in Aug 2021, and then upzoning at Hollywood Blvd near Vine at Planning Commission.)

**M** Metro B Line Station

**Regional Center Subareas**

- RC1A** 1000 INCENTIVES 4.65:1 FAR IF 100% AFF.
- RC1B** 1001 INCENTIVES 6.75:1 FAR IF NO REQUIRED PARKING
- RC2** 1002 INCENTIVES 3.75:1 FAR FOR 100% AFF., 100% RES.DENSITY INCREASE NO REQ'D RES. PARKING
- RC3** 1003

AREAS OF CHANGE VS CPIO FEBRUARY 2021

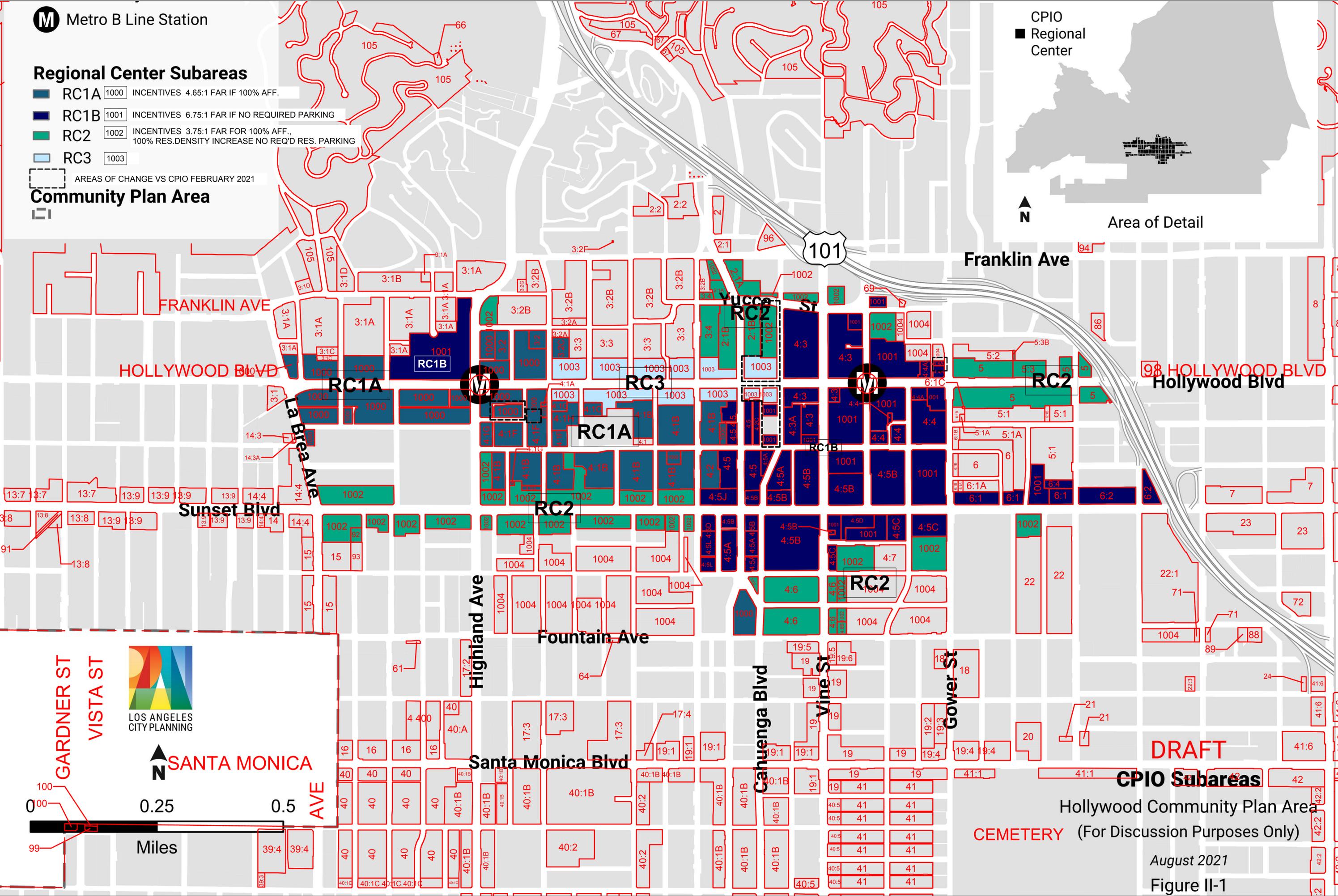
**Community Plan Area**



CPIO  
Regional Center



Area of Detail



**SANTA MONICA**



**DRAFT**

**CPIO Subareas**

Hollywood Community Plan Area

CEMETERY (For Discussion Purposes Only)

August 2021

Figure II-1

## Communication from Public

**Name:**

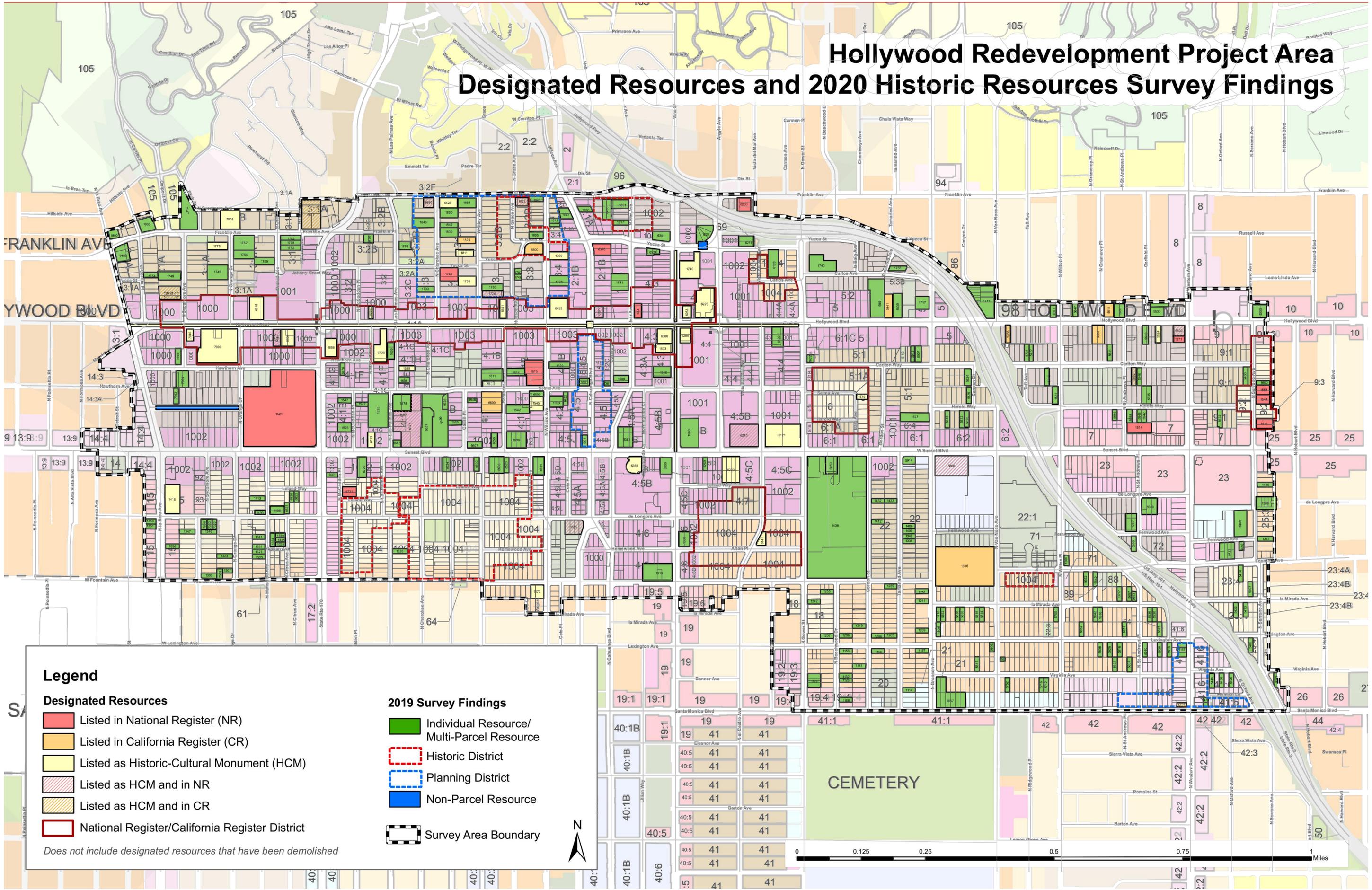
**Date Submitted:** 04/19/2023 08:32 PM

**Council File No:** 21-0934

**Comments for Public Posting:** Submitted on behalf of Hollywood Heritage - The Feb 2021 LA Planning MAP and ARG overlap shows historic survey data mapped; the location of historic resources is available on the City Planning website, but not utilized for the Community Plan Update. This is the basics of conflict mapping - showing how and where proposed zoning creates an unnecessary conflict with existing historic buildings. This is overlaid on the Hollywood Community Plan subareas; subareas in the 1000 series are in the CPIO. In the subareas, all the current "D" conditions are being canceled. Removing 11 longstanding Ordinances in the former redevelopment area, part of a total of 41 Ordinances for 809 land parcels with their "D limitations and Q conditions" being canceled. This means that the Plan will remove a careful planned system of requirements for environmental protection; ensuring public input and public benefits, Urban Design and neighborhood protections, infrastructure health, and monitoring of traffic and an obligation to deal with gridlock and parking deficit. (The City is in violation of many of these requirements, as was the redevelopment agency predecessor, so is canceling those sorely needed requirements). The release of higher density accompanies a degradation of urban quality including loss of historic buildings and neighborhoods.

# Hollywood Redevelopment Project Area

## Designated Resources and 2020 Historic Resources Survey Findings



### Legend

#### Designated Resources

- Listed in National Register (NR)
- Listed in California Register (CR)
- Listed as Historic-Cultural Monument (HCM)
- Listed as HCM and in NR
- Listed as HCM and in CR
- National Register/California Register District

#### 2019 Survey Findings

- Individual Resource/  
Multi-Parcel Resource
- Historic District
- Planning District
- Non-Parcel Resource
- Survey Area Boundary

*Does not include designated resources that have been demolished*



## Communication from Public

**Name:**

**Date Submitted:** 04/19/2023 08:46 PM

**Council File No:** 21-0934

**Comments for Public Posting:** Hollywood Heritage would like the attached file uploaded to council file. This file is a copy of the order issued to planning by Bertoni regarding the CPIO and the inclusion of housing development.

DEPARTMENT OF  
CITY PLANNING  
COMMISSION OFFICE  
(213) 978-1300  
CITY PLANNING COMMISSION  
SAMANTHA MILLMAN  
PRESIDENT  
VAHD KHORSAND  
VICE-PRESIDENT  
DAVID H. J. AMERICOZ  
CAROLINE CHOE  
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KAREN MACK  
MARC MITCHELL  
VERONICA PADILLA-CAMPOS  
DANIA M. PERLMAN

CITY OF LOS ANGELES  
CALIFORNIA



ERIC GARCIA  
MAYOR

I hereby certify and attest this to be a true and correct copy of the official record on file in the office of the Department of City Planning of the City of Los Angeles.  
ERIC GARCIA  
MAYOR  
designated as CEO Implementation Manager  
Brittan Parsons 06/11/2020  
City of Los Angeles  
Department of City Planning

EXECUTIVE OFFICES  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
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VINCENT F. BERTON, AICP  
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DEPUTY DIRECTOR

DIRECTOR'S INITIATION OF LEGISLATIVE ACTION  
HOLLYWOOD COMMUNITY PLAN IMPLEMENTATION OVERLAY

Los Angeles Municipal Code, Section 12.32 sets forth the framework whereby legislative actions such as land use ordinances and zoning designations may be considered, stating that the Director of Planning may initiate consideration of a proposed land use ordinance.

On December 20, 2019, the Governing Board of CRA/LA, a Designated Local Authority, as successor agency to the Former Community Redevelopment Agency (Successor Agency), transmitted completed drafts of the "Hollywood Boulevard District and Franklin Avenue District Urban Design Plan Design For Development," and the "Sunset District Urban Design Plan and Guidelines" to the City of Los Angeles, Department of City Planning. The Governing Board's action took place following a November 11, 2019 transfer of all land use related plans and functions over remaining redevelopment project areas to the City of Los Angeles, when the Successor Agency and its Governing Board no longer had authority to approve or adopt the subject plans. Earlier, on November 7, 2019, the Governing Board of the Successor Agency approved a "Hollywood Mobility Strategy" plan, initially prepared in 2012, to transmit to the City with a recommendation to implement the plan, as well as draft Density Transfer Procedures to transmit to the City.

The subject plans and procedures are initially called for in Sections 505.2, 506.2.1, and 506.2.2 of the Hollywood Redevelopment Plan, which envisioned that Designs for Development would be created for "Franklin Avenue Design District," a "Hollywood Boulevard District," and a "Hollywood Core Transition District," respectively; and Sections 518.1 and 511 concerning Circulation, Parking and Loading Facilities (§ 518.1) and Preservation, Rehabilitation and Retention of Properties, respectively. The Hollywood Redevelopment Plan, which expires on July 12, 2033, envisioned that the plans and procedures would address the treatment of historic resources, the massing and orientation of new buildings, and the reinforcement of the pedestrian environment, among other goals. Neither the Former Agency nor the Successor Agency ever timely adopted or implemented the aforementioned plans or procedures, even notwithstanding a settlement in 2008, supplemented by a settlement in 2018 (referred to together as Settlement) which includes timelines to complete the plans and procedures.

The procedures in the Settlement for consideration of subject draft plans and procedures differ from those required by the City Charter and Los Angeles Municipal Code to consider such matters. The comprehensive regulations in the subject plans and procedures cannot be lawfully implemented by the City without compliance with, among other matters, City Charter Sections 556, 558, and 560, and LAMC Section 11.5.6.

Given that the City's efforts to finalize the Hollywood Community Plan are nearing a culmination, I am directing staff to adapt the existing draft Hollywood Community Plan's Community Plan

Implementation Overlay (CPIO) to provide objective development standards that meet the common goals of the draft Hollywood Community Plan and the existing Hollywood Redevelopment Plan, in addition to addressing the land use requirements expressed within the Hollywood Redevelopment Plan and related approved environmental mitigation measures. I am further directing that staff use the "Hollywood Boulevard District and Franklin Avenue District Urban Design Plan Design For Development;" the "Sunset District Urban Design Plan and Guidelines;" and the Density Transfer Procedures transmitted to the City by the Successor Agency, as well as the historic resources survey completed by CRA/LA on January 28, 2020, to inform the completion of a new draft CPIO.

In addition, I am directing staff to refer the "Hollywood Mobility Strategy," developed in 2012, to the Department of Transportation.

Lastly, I am directing staff to ensure that the adapted CPIO provides clear incentives for the production of affordable housing within Hollywood, consistent with LAMC 12.22.A 31(d), and that careful consideration be made so that any development standards or design guidelines brought forward for adoption not subvert the Community Plan's goals to provide additional housing within transit served areas in Hollywood.

Therefore, pursuant to Los Angeles Municipal Code Sections 12.32, 13.14, and 12.22.A 31(d), I hereby initiate a Community Plan Implementation Overlay to be presented to the City Planning Commission with the Hollywood Community Plan.



VINCENT P. BERTONI, AICP  
Director of Planning

February 11, 2020  
Date

## Communication from Public

**Name:** United Neighborhoods for Los Angeles/Casey Maddren  
**Date Submitted:** 04/19/2023 10:10 PM  
**Council File No:** 21-0934  
**Comments for Public Posting:** United Neighborhoods for Los Angeles (UN4LA) would like to submit the attached comments regarding the Hollywood Community Plan Update.



**United Neighborhoods for Los Angeles**

**www.un4la.com**

**UN4LA Board**

***Casey Maddren, President***

***Richard Platkin, Vice-President***

***Cherilyn Smith, Treasurer***

***David Ewing***

***Annie Gagen***

***Jack Humphreville***

***Kim Lamorie***

***Gina Thornburg***

April 19, 2023

Planning & Land Use Management Committee  
Los Angeles City Hall  
200 N. Spring St.  
Los Angeles, CA 90012

Re: Hollywood Community Plan Update  
Council File: 21-0934  
Summary of Concerns & Additional Comments

Members of the PLUM Committee,

United Neighborhoods for Los Angeles (UN4LA) is a community group formed to foster better planning and better government within the County of Los Angeles, and all cities and unincorporated areas contained within the County's borders. Among UN4LA's areas of focus are planning, development, and the environment, but UN4LA's larger purpose is to speak to any issue which relates to the health and well-being of the citizens of Los Angeles County.

We're writing to express our concerns about the Hollywood Community Plan Update, as currently proposed. Following is a short summary of our primary concerns:

- *The Plan apparently does not comply with LAMC Sec. 11.5.8, which requires the existence of a program to create an inventory of RSO and affordable units and to monitor the inventory;*
- *The Plan anticipates significant growth, but it's unlikely that LA's increasingly dry*

- hydrology can sustain anticipated levels of growth;*
- *The Plan should mandate the verification of new affordable units by inspection to ensure that the units are occupied by households that meet affordability requirements;*
  - *Hollywood's tree canopy is declining, but the Plan increases opportunities for by-right development with no environmental review;*
  - *The Plan does not meet the General Plan's monitoring requirements;*
  - *The Plan's projections re GHG emissions are based on the assumption that transit ridership will increase with greater density, but this is not supported by recent housing and transit data;*
  - *The Plan's estimates of current population in the HCP area are not accurate, and projections of future growth seem at odds with recent reports of population decline.*

We would like to highlight two of these concerns, and explain in more detail why we feel the Plan does not comply with existing law.

#### Failure to Comply with LAMC Section 11.5.8, Requirement for Housing Inventory & Monitoring Program

LAMC Section 11.5.8, A, states that:

*[...] No amendment to a plan for any of the 37 planning areas, including reduction in the number of such areas, changes in their respective boundaries, land uses permitted within or at any particular location in any such area, or any other material change, may be made until the completion of a comprehensive assessment of such proposed changes by the Planning Department to ensure that such changes do not:*

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

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

We have seen no evidence in the documents made available so far that such a program has been created, and there appears to be no inventory of affordable and RSO units. Given the high levels of displacement in Hollywood over the past decade, it's unacceptable to ignore this requirement of the LAMC.

#### Realistic Projections of Available Water Resources Make the Plan's Growth Projections Appear Unsustainable

The DEIR for the Plan predicts that LADWP will be able to supply water for projected growth under any scenario, based on the assurances of the 2020 Urban Water Management Plan. If we look at the UWMP's Section ES-6, Water Supply Reliability, we find the following statement:

*"LADWP does not anticipate water shortages as demands are met by the available supplies under all hydrologic scenarios."*

Unfortunately, in light of the extreme dry conditions experienced in LA in recent years, it has become clear that the projections made in the 2020 UWMP regarding LA's future water resources are not realistic. To give just one example, in Exhibit ES-Q, Fiscal Year 2044-45 Dry Hydrology, the graph shows an expected total production of 746,000 AF, based on the assumption that LA will get 43% of its water from the Metropolitan Water District.

The MWD relies heavily on the Colorado River to supply the needs of LA area jurisdictions. The fact that last year the US Bureau of Reclamation was warning that Lake Mead was approaching dead pool seems to be a strong indication that the UWMP's projections are dangerously optimistic. The Interior Department is currently studying options to reduce allocations to stakeholders that receive water from the Colorado River. Of the options Interior is studying, Action Alternatives 1 and 2 both involve the reduction of allocations to stakeholders.

Interior Department Announces Next Steps to Protect the Stability and Sustainability of Colorado River Basin, April 11, 2023

<https://www.doi.gov/pressreleases/interior-department-announces-next-steps-protect-stability-and-sustainability-colorado>

*Action Alternative 1: Action Alternative 1 models potential operational changes to both Glen Canyon Dam and Hoover Dam. Action Alternative 1 includes modeling for reduced releases from Glen Canyon Dam, as well as an analysis of the effects of additional Lower Colorado River Basin shortages based predominately on the priority of water rights. Action Alternative 1 models progressively larger additional shortages as Lake Mead's elevation declines, and larger additional shortages in 2025 and 2026, as compared with 2024. The total shortage contributions in 2024, including those under existing agreements, are limited to 2.083 million-acre-feet because this is the maximum volume analyzed in the 2007 Interim Guidelines final environmental impact statement.*

*Action Alternative 2: Action Alternative 2 is similar to Action Alternative 1 in how it models potential operational changes to both Glen Canyon Dam and Hoover Dam. Action Alternative 2 includes modeling for reduced releases from Glen Canyon Dam, as well as an analysis of the effects of additional Lower Colorado River Basin reductions that are distributed in the same percentage across all Lower Basin water users under shortage conditions.*

Based on the above, we believe it would be best to delay adoption of the Hollywood Community Plan Update until a program consistent with LAMC Section 11.5.8 has been created, and a more realistic analysis of future hydrology can be prepared.

For background, we are attaching some of the letters previously sent by UN4LA covering some of these issues in more detail.

- *DEIR Comments, January 31, 2019, Attachment 1*
- *Letter to City Planning Commission, February 8, 2021, Attachment 2*
- *Letter to City Planning Commission, March 17, 2021, Attachment 3*

We realize that planning for the future in a city of the size and complexity of Los Angeles is a monumental task. We hope that by working together we can create a road map for future growth that will lead to a livable, sustainable community for all those who live in Hollywood and surrounding areas.

Thank you for your time.

Sincerely,  
Casey Maddren, President  
United Neighborhoods for Los Angeles



**United Neighborhoods for Los Angeles**

**[www.un4la.com](http://www.un4la.com)**

**UN4LA Board**

***Casey Maddren, President***

***Grace Yoo, Treasurer***

***Kim Lamorie, Secretary***

***Don Andres***

***Melissa Arechiga***

***Annie Gagen***

***Jack Humphreville***

***Richard Platkin***

***Cherilyn Smith***

January 31, 2019

Linda Lou  
Los Angeles Department of City Planning  
200 N. Spring St., Room 667  
Los Angeles, CA 90012

Re: Comments on DEIR for Hollywood Community Plan Update, ENV-2016-1451-EIR

Dear Ms. Lou,

United Neighborhoods for Los Angeles (UN4LA) would like to submit the following comments on the Hollywood Community Plan Update DEIR.

We ask that you please send us a brief e-mail to acknowledge receipt of these comments.

Thanks for your help.

Sincerely,  
Casey Maddren, President  
United Neighborhoods for Los Angeles  
[cmaddren@gmail.com](mailto:cmaddren@gmail.com)

## UNITED NEIGHBORHOODS FOR LOS ANGELES

### COMMENTS ON HOLLYWOOD COMMUNITY PLAN UPDATE DEIR ENV-2016-1451-EIR

#### GENERAL COMMENTS

##### re:code LA

#### **Why Has the HCP Update Been Prepared Using Existing Zoning Categories When New re:code Categories Will Be Applied After Adoption?**

The City is getting ready to roll out re:code, "a comprehensive revision of the City of Los Angeles' Zoning Code", by the end of 2019. In contrast to the existing code, re:code adopts a form-based approach to zoning, which is a fundamental shift in the conceptual framework. Many urban planners advocate the form-based approach, saying that it will reframe our vision of the city, emphasizing compact urban neighborhoods as opposed to endless suburban sprawl.

**City Planning staff has said that once new re:code zoning categories are adopted, they will be applied to newly adopted Community Plans. But the re:code categories will alter existing zoning and have the potential to bring increased density and different uses than those permitted by the existing code. The DEIR only analyzes the impacts under the existing zoning categories. The DEIR makes no effort to analyze possible impacts after the application of re:code.**

Why was the Hollywood Community Plan Update written and presented to the community using the existing code? Why was the Community Plan not written using the new re:code zoning categories, and presented to the community using those categories?

**By presenting the HCP Update to the community using the existing code, knowing full well that fundamentally different zoning categories would be applied to the plan after the adoption of re:code, the City has failed to inform the Hollywood community as to how the Plan would actually be implemented. In fact, this approach seems to be a deliberate attempt to subvert community engagement by changing the zoning definitions after the fact.**

#### AIR QUALITY

#### **Consistency with SCAG's Failed RTP/SCS Has Done Nothing to Increase Transit Ridership**

The plan states that it is consistent with SCAG's Regional Transportation Plan/Sustainable Communities Strategy, and therefore assumes improvement in air quality. But SCAG's RTP/SCS has been a dismal failure. While California's air quality has improved in some respects, California Air Resources Board data shows that the improvement is largely due to the State's progress in renewable energy generation. The fact is, Californians have increased their driving in recent years, and this has erased

substantial progress in other quarters toward clean energy. Here's an excerpt from an LA Times articles that summarizes data released by the California Air Resources Board:

**California hit its climate goal early — but its largest source of pollution keeps rising, LA Times, July 22, 2018**

*"Emissions from cars and trucks, already California's biggest source of greenhouse gases, have been on the rise for the past few years in step with postrecession economic growth. Increased driving is the main reason why transportation pollution ticked up another 2% in 2016."*

One of the keys to the SCAG RTP/SCS is its claim that increasing density near transit hubs will get people out of cars and onto trains. In the LA area, this approach has failed completely. While City Planning has granted significant upzoning to developers building near transit hubs, transit ridership has fallen at the same time that per capita car ownership has increased dramatically. In 2018 the UCLA Institute of Transportation Studies (ITS) released a report entitled Falling Transit Ridership: California and Southern California. The report documents the disturbing decrease in transit ridership since 2000, and the concurrent increase in car ownership.

**Falling Transit Ridership: California and Southern California**

[https://www.scag.ca.gov/Documents/ITS\\_SCAG\\_Transit\\_Ridership.pdf](https://www.scag.ca.gov/Documents/ITS_SCAG_Transit_Ridership.pdf)

Here's an excerpt from the Executive Summary:

*"Since 1990, the SCAG region has added over 100 miles of light and heavy rail in Los Angeles County, and over 530 miles of commuter rail region-wide. These investments, however, have not been matched by increases in transit ridership. Transit ridership in the SCAG region reached its postwar peak in 1985. Through the 1990s and 2000s ridership rose and fell modestly, but never again reached its 1985 level. Figure ES-1 shows that per capita trips have been mostly declining in the SCAG region since 2007, and have fallen consistently since 2013."*

This should make clear that City Planning's efforts to build transit-oriented density (TOD) have failed miserably. TOD can be implemented successfully, but in LA it seems to be nothing more than an excuse to grant developer requests for upzoning. We have seen significant upzoning near transit hubs and billions of dollars invested in new transit infrastructure, but transit ridership in Los Angeles is lower than it was 30 years ago. City Planning has upzoned numerous parcels near transit in Hollywood and hundreds of new apartments have been built, and yet traffic is worse than ever. Rush hour congestion on Sunset, Cahuenga, La Brea, Franklin, and the Hollywood Freeway have continued to worsen. At the same time, secondary streets such as Wilcox, Gower, Argyle, and De Longpre are now backed up with rush our traffic.

**For these reasons, City Planning's claim that the HCP Update's compatibility with SCAG's 2016 RTP/SCS will reduce emissions cannot be considered credible. For years City Planning has been following the recommendations of the 2012 RTP/SCS, (which are largely the same as the current version) and we have seen none of the promised reductions in car usage. We must insist that the HCP Update make realistic projections based on actual, verifiable data. Simply claiming consistency with a regional strategy that has produced no results will only continue to reproduce the strategy's negative outcomes. The DEIR's**

**conclusions regarding future air quality under the HCP Update cannot be considered credible.**

**GREENHOUSE GAS EMISSIONS**

**In Spite of Claims that Upzoning Near Transit Will Help Fight Climate Change, the Data Shows that GHG Emissions from Passengers Vehicles Are Rising Steadily**

In the section on greenhouse gas emissions (GHGs), the EIR cites numerous laws enacted at the Federal, State and Local level, including SB 375, The Sustainable Communities and Climate Protection Act. This law was designed to fight greenhouse gas emissions, and requires the implementation of Sustainable Communities Strategies. The EIR states:

*“Under the Sustainable Communities Act, CARB [California Air Resources Board] sets regional targets for GHG emissions reductions from passenger vehicle use. CARB has set the following reduction targets for SCAG: reduce per capita eight percent of GHG emissions below 2005 levels by 2020 and 13 percent below 2005 levels by 2035 .”*

For years the City of Los Angeles has embraced the Sustainable Communities Strategies that SCAG has created to implement SB 375. The EIR for the HCP Update claims that the plan will reduce GHGs by continuing to embrace SCAG’s transportation strategies, but the data presented in the EIR calls this into question.

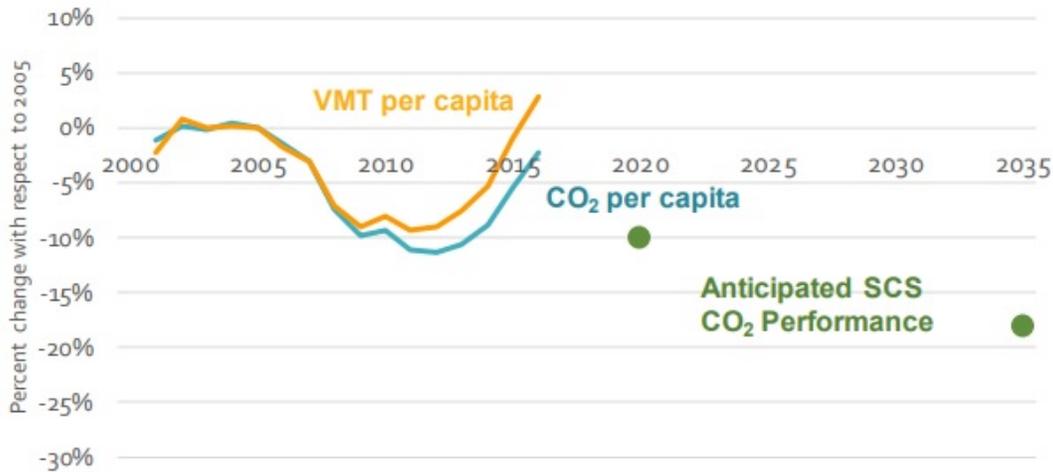
Table 4.7-3: Estimated Greenhouse Gas Emissions in the Project Area shows that adoption of the HCP Update would cause significant increases in GHGs from transportation and natural gas (direct sources), and electricity, water, and wastewater (indirect sources). Since the EIR shows that the existing 1988 Hollywood Community Plan offers ample capacity for housing according to SCAG projections, and since Hollywood still offers plenty of room for commercial development, we have to ask why the City would want to adopt the HCP Update when it acknowledges that GHG emissions would increase under the plan.

We must reiterate that the City’s efforts at TOD have failed completely, in spite of constant reminders that these efforts are consistent with SCAG’s RTP/SCS transportation strategies. The California Air Resources Board (ARB) issued a report in 2018 which states clearly that increased vehicle travel is causing increased GHG emissions.

**ARB Progress Report, 2018, page 4**

*“A key finding of this report is that California is not on track to meet the greenhouse gas reductions expected under SB 375 for 2020, with emissions from statewide passenger vehicle travel per capita increasing and going in the wrong direction as shown in the figure below.”*

**Statewide CO<sub>2</sub> and Vehicle Miles Traveled (VMT) Per Capita Trend with Respect to Anticipated Performance of Current SB 375 SCSs<sup>2</sup>**



Source: CDTFA, U.S.EIA, U.S.EPA, CARB

The fact that the HCP Update is consistent with the SCAG RTP/SCS is meaningless if it does not produce the intended results. There is widespread agreement that climate change is a serious threat and that we must reduce GHGs dramatically. If current policies are not even coming close to reaching our stated goals in this respect, then we must consider additional measures such as preventing displacement of low-income households which rely on transit and promoting the use of electric vehicles by building additional infrastructure to support them. The HCP Update does not mention either one of these options, nor does it offer other strategies beyond those mentioned in the RTP/SCS. Instead it insists that the City is fighting climate change simply by concurring with the transportation strategies outlined in SCAG's RTP/SCS. The facts show that with regard to transportation, these strategies are not working. Because the DEIR fails to acknowledge and analyze this, its analysis is inadequate.

POPULATION, HOUSING AND EMPLOYMENT

**Why Does the HCP Update Include Significant Upzoning When the Current Zoning Will Accomodate SCAG's 2040 Population Projections?**

According to the DEIR, the Proposed Plan Reasonably Expected Development would offer housing capacity for 121,000 - 132,000 households. This is significantly over the 113,000 households that SCAG projects by 2040.

And interestingly, the DEIR states that the 1988 Hollywood Community Plan would offer the capacity for 113,000 - 121,000 households, which is already above SCAG's projected 2040 need. The fact that the 1988 HCP does not include the new local and

state density bonus incentives that have been adopted in recent years means that actual housing capacity under the existing plan has risen and would easily exceed the need projected by SCAG.

**Since the 1988 HCP allows for housing capacity beyond SCAG's current 2040 projection, and since recent state and local density bonus laws would allow even greater capacity, we find no justification for the significant upzoning in many areas under the proposed HCP Update.**

**We also must question the logic behind proposing such upzoning since it removes the incentive to build affordable units through density bonus trade-offs. If developers can build larger projects by-right, what will motivate them to include affordable units? The adoption of the Warner Center 2035 Plan has already shown the failure of this approach. The upzoning brought about by the Warner Center 2035 Plan did lead to the approval of about 2,500 new residential units in the plan area, however none of these units are accessible to low-income or middle-income residents.** Now the City is trying to find a way to force developers to either create or fund affordable housing in Warner Center. This fiasco should be a clear warning to the City Council that the generous upzoning included in the HCP Update would be a huge mistake.

**In another bizarre move, in some areas the HCP Update maintains existing floor area ratio (FAR) for residential uses, but allows hotel projects to obtain up to double the FAR. Does the City really want to encourage the construction of hotel rooms over residential units?** While tourism is important to Los Angeles, and we must continue to build hotels, there is a far greater need for new housing than for hotel rooms. Every night thousands of homeless people can be found sleeping on the street, but there have been no media reports of tourists setting up tents on Hollywood Boulevard.

Since the DEIR shows that the existing 1988 HCP offers the capacity to house SCAG's projected 2040 population, and since the DEIR also shows that adoption of the HCP Update would lead to greater water use, greater waste generation, and increased fossil fuel emissions, it seems clear that the environmentally preferable action is to reject the HCP Update.

## TRANSPORTATION AND TRAFFIC

### **The HCP Update's Reliance on Failed Strategies Will Only Bring More Failure**

Again, the DEIR relies heavily on SGAC's RTP/SCS to justify the HCP Update. We have already outlined the failure of this strategy in attempting to shift travelers from cars to busses and trains. Rather than repeat arguments given above, in this section we will merely quote from the rosy projections given in the RTP/SCS, and then contrast that with reality.

Here's a quote from page 8 of SCAG's 2012 RTP/SCS:

#### Sustainable Communities Strategy

*"The SCS focuses the majority of new housing and job growth in high-quality transit*

*areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures."*

And here's a quote from page 21 of the 2016 RTP/SCS:

What We Will Accomplish

*"Daily travel by transit would increase by nearly one-third, as a result of improved transit service and more transit-oriented development patterns." [Emphasis added.]*

Are the authors delusional? Have they ever taken the time to actually look at Metro's ridership stats? Here are two figures easily obtained from Metro's on-line statistics database:

Metro Systemwide Ridership (Bus and Rail)

**2010** 453,825,514

**2018** 383,795,186

While ridership in some years grew slightly, the overall trend is down, and these figures show a 15% decline since 2010. Metro ridership has declined every year since 2014.

A public records act request was made for Metro statistics on Hollywood area lines. No response had been received as of the writing of these comments.

And the declines are not limited to Metro. LADOT, which only serves the City of Los Angeles, has also seen a depressing drop in ridership. While LADOT has not responded to repeated requests for statistics on Hollywood area lines, we were able to obtain the following figures from their 2015 Short Range Transit Plan.

LADOT Ridership

**FY 2012** 23,864,160

**FY 2013** 22,847,860

**FY 2014** 21,581,449

It appears that LADOT ridership is going in the same direction as Metro's. And a look at the LADOT Annual Report for Fiscal Year 2017–2018 seems to indicate that the decline has continued.

**Trips a Year (FY 17 Audit)** 19,734,177

**It is clear that, in spite of City Planning's insistence, the policy of building high-density residential structures near transit has delivered absolutely nothing in terms of increased transit ridership. The HCP Update's claims that continuing this policy will produce different results are not credible. For this reason, we do not believe the DEIR's analysis of the HCP Update's transportation and traffic impacts are even remotely credible.**

## UTILITIES & SERVICE SYSTEMS

### **Hollywood's Water Infrastructure Is Already Strained, and Increased Density Will Only Exacerbate the Problem**

Hollywood's water infrastructure is aging and numerous breaks in recent years have shown that it is increasingly stressed. This interactive map from the LA Times shows pipe ruptures between 2010 and 2014.

Los Angeles Water Main Leaks Since 2010 from LA Times  
<http://graphics.latimes.com/los-angeles-pipe-leaks/>

A look at the Central Hollywood area shows well over 200 leaks in four years. The map also shows that over 80% of the pipes in the area are over 75 years old. The system is badly in need of maintenance and upgrades. While the DWP has been working aggressively to replace water infrastructure throughout the City, there are currently no projects scheduled to address aging pipes in Central Hollywood.

In 2014 there was a major break on the Sunset Strip. At the time DWP personnel said that plans were in the works to replace four miles of pipe between Beverly Hills and Fairfax. However, there is currently still no timetable for starting this project, and the complexity of the undertaking means that planning the project could take years.

There have been numerous breaks along the Cahuenga corridor, some of them fairly large. Much of the pipe serving this area is over 75 years old. Again, the DWP has spoken of plans to replace water infrastructure in this corridor, but so far no project has been scheduled.

The highest concentration of leaks on the Times map is on Santa Monica between Cahuenga and La Brea. While the DWP has responded rapidly when breaks occur, and service interruptions have generally been brief, the frequency of the breaks indicates a need for significant maintenance or replacement.

The DWP is working hard to serve LA's water needs, but the system is huge and there are many issues that need to be addressed. While new development can bring funding for more firefighters or emergency personnel, the DWP is funded by ratepayer revenues. Increased density in the Hollywood area will not bring increased funding for water infrastructure. The numerous breaks that have occurred in recent years attest to the need for maintenance and replacement, but at this time there are no projects scheduled for Central Hollywood, where the HCP Update proposes significant upzoning.

**The DEIR claims that the level of development proposed in the HCP Update will**

**not cause significant impacts to the area's water system. This claim is not credible, and shows that City Planning has failed to make any serious attempt to assess the state of the existing water infrastructure.**



United Neighborhoods for Los Angeles

[www.un4la.com](http://www.un4la.com)

**UN4LA Board**

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February 8, 2021

City Planning Commission  
Department of City Planning  
200 N. Spring Street  
Los Angeles, CA 90012

Re: HCPU Recommendation Report  
Amendments to the Hollywood Redevelopment Plan  
Additional Comments Re HCPU CPIO/EIR/Other Issues

Case No.: CPC-2016-1450-CPU

CEQA No.: ENV-2016-1451-EIR

Members of the City Planning Commission,

United Neighborhoods for Los Angeles (UN4LA) is a community group formed to foster better planning and better government within the County of Los Angeles, and all cities and unincorporated areas contained within the County's borders. UN4LA's primary areas of focus are planning, development, budget/finance, environment/open space, and ethics.

UN4LA has reviewed the Recommendation Report for the Hollywood Community Plan Update and the Proposed Amendments to the Hollywood Redevelopment Plan. We are concerned that the Recommendation Report makes a number of claims regarding the proposed HCPU which are not borne out by the facts. We are also concerned that the proposal to gut the Hollywood

Redevelopment Plan will eliminate affordable housing requirements and reduce protections for historic resources. We also question the legality of this proposal.

In addition, the CPIO's proposed density incentives for the Regional Center and the accompanying changes to the approval process are clearly designed to promote the interests of private developers while reducing public engagement and eliminating appeals. Rather than encouraging the development of housing accessible to present and future Hollywood residents, these proposals will further exacerbate the inequalities caused by the City's current incentives. In recent years, the City's approach to creating housing has relied heavily on density bonuses. The result? Since 2014, the vast majority of new units created have been for the affluent, with about 90% of new units falling under the Above Moderate Income category, with the combined number of Moderate, Low and Very Low Income units amounting to about 10%. The CPIO's proposals for density incentives in the Regional Center will further hardwire this disparity in housing production.

We are concerned that the City is preparing to make material changes to the Hollywood Community Plan Area without having fulfilled the requirements of LAMC Section 11.5.8., which requires a comprehensive inventory of affordable and RSO units in the area.

We are also submitting additional input on the Hollywood Community Plan Update and the associated CPIO and EIR. Please see our detailed comments below.

Sincerely,  
Casey Maddren, President  
United Neighborhoods for Los Angeles  
cmaddren@gmail.com  
323 462-7804

# UN4LA COMMENTS TO CITY PLANNING COMMISSION

## HOLLYWOOD COMMUNITY PLAN UPDATE, EIR, CPIO & ASSOCIATED APPROVALS

### RECOMMENDATION REPORT COMMENTS

The Recommendation Report makes a number of claims which are not supported by facts. It's assertions regarding the production of housing, sustainable development, greenhouse gas emissions and the promotion of alternate modes of transit have no basis in reality, and the Report offers no evidence that the HCPU and the accompanying CPIO will achieve any of these goals. The Report claims that the HCPU and the CPIO will:

#### Provide a Range of Housing and Employment Opportunities

"The Proposed Plan seeks to accommodate anticipated future growth, and address the City's ongoing housing crisis [...]"

In fact, the EIR acknowledges that the 1988 Plan offers sufficient zoned capacity to accommodate SCAG's growth projections for 2040. Upzoning to increase capacity beyond SCAG projections is clearly an effort to induce growth. Additionally, recent population data shows that Los Angeles has actually seen a net decrease over the last few years. The following is an excerpt from a story published by the LA Times on December 16, 2020:

*The California Department of Finance, which monitors the state's population data, found that from July 1, 2019 to July 1, 2020, California saw a net gain of only 21,200 new residents — a 0.05% growth rate not seen since 1900. As of July, the state's population was 39.78 million.*

*Over that period, Los Angeles County reported a net loss of 40,036 people, more than any other county in the state.*

***"This is a real sea change in California, which used to be this state of pretty robust population growth," said Hans Johnson, a demographer at the Public Policy Institute of California. "It hasn't been for some time now. But it's now gotten to the point where the state is essentially not growing population-wise at all."***

California population growth hits record lows, from LA Times, 12/16/20

<https://www.latimes.com/california/story/2020-12-16/california-population-growth-hits-record-lows-fueled-by-covid-19-continued-exodus>

The Recommendation Report also states:

"The Plan supports the development of affordable housing by linking the provision of increased development rights with an affordable housing incentive system."

In recent years the City has claimed repeatedly that it is addressing the need for affordable housing by offering density incentives. And what has the City to show for it? As we noted in our previous comment letter of December 16, 2020, the City's own Housing Progress Dashboard

shows that on average 88% of new units created since 2015 have been for Above Moderate Income Households, with Moderate, Low Income and Very Low Income Households competing for the remaining 12%. The City of LA has utterly failed to meet affordable housing needs through density incentives. Increasing these incentives in the Hollywood area will only exacerbate the problem.

### **Create a Network of Safe, Multi-Modal Linkages**

"The Plan bolsters the creation of new paths, routes and lanes that facilitate better movement of pedestrians, bicyclists and motorists throughout the Community Plan Area."

As we've stated in our previous comments, ridership on both Metro and DASH lines has dropped like a rock over the past six years. The City's repeated insistence that it is promoting transit-oriented development has, in fact, produced less than nothing. The City has neither presented, nor even gathered, data on walking and biking to allow assessment of progress in these areas. Claims that the Plan will promote multi-modal transit options are not supported by any evidence.

### **Promote Sustainable Development**

"The Hollywood Community Plan proposes to promote sustainable development by establishing a land use pattern where future growth occurs in areas that are well served by transit and/or employment opportunities thus reducing future greenhouse gas emissions."

As we noted in our letter of January 31, 2019, the 2018 report from the California Air Resources Boards states:

*A key finding of this report is that California is not on track to meet the greenhouse gas reductions expected under SB 375 for 2020, with emissions from statewide passenger vehicle travel per capita increasing and going in the wrong direction as shown in the figure below.*

As for locating new housing near employment centers, the Recommendation Report fails to acknowledge the possibility, voiced by a number of observers, that the pandemic may cause a permanent shift toward working at home. While it's too early to tell whether this change will be long-term, the Recommendation Report's failure to even mention this possibility shows that the authors are more concerned with justifying increased density at all costs, rather than responding to actual population and employment trends.

### **Covid-19, Recommendation Report, Page A-4**

"The housing crisis pre-dated the pandemic, however the need for housing, and affordable housing in particular, has become even more apparent."

The Recommendation Report includes a brief section acknowledging that the City has been affected by the pandemic, but makes no effort to actually assess how the pandemic has impacted Hollywood with regard to housing, employment and transportation. The Report makes no attempt to assess how the pandemic's impacts in these areas could alter the community's needs. The Report's failure to offer any discussion of these issues implies that the pandemic

has had no significant impacts on the Hollywood area and that the Plan, published over two years ago, does not need to be altered in any way.

While the pandemic began well after the publication of the HCPU and the DEIR, its impacts have been substantial and could be lasting. Many observers have noted the pandemic's effects on population distribution, housing, transportation, commercial space and office space. The City could not have foreseen these impacts, but it must take the time to assess them before moving ahead with approval of a plan govern new development.

### **COMMUNITY PLAN IMPLEMENTATION OVERLAY COMMENTS**

The CPIO attempts to illegally evade required environmental review under CEQA. Within the Regional Center, it offers generous increases in FAR and up to 100% increases in residential density for projects that include as little as 10% affordable housing. The CPIO also states that these projects can receive ministerial approval with no possibility of appeal. Withholding these proposals until the release of the CPIO appears to be a deliberate attempt to deceive the public.

Unbelievably, the City goes even further. The CPIO includes provisions for transfer of unused FAR from historic sites to other projects, further increasing possible maximum density. The City appears to be attempting to do away with any height or density limits within the Regional Center. And, in a major change to the City's standards for project approvals, the CPIO states that the threshold to trigger a Site Plan Review will go from 50 units to 200 units.

The proposed increases in FAR and residential density were not analyzed in the EIR. Using the dishonest and deceptive tactic of allowing approvals of such projects through a ministerial process subverts both legally required environmental review and sound planning practice. And setting a different standard for Site Plan Review within the plan area illegally subverts the requirements of the Planning Code.

### **PROPOSED ORDINANCE TO GUT HOLLYWOOD REDEVELOPMENT PLAN**

The City has illegally proposed an ordinance which would effectively gut the Hollywood Redevelopment Plan. The proposed ordinance would remove necessary affordable housing requirements. It would also remove protections for historic structures within the Hollywood area.

It is disturbing that the City, having failed for years to meet RHNA goals for affordable housing, and at the same time having failed miserably to meet the Hollywood area's need for affordable housing, is now attempting to erase legal requirements set by the Hollywood Redevelopment Plan.

### **GENERAL COMMENTS**

#### **Population: Housing, Transit, Employment Policies vs. Reality**

For over 20 years it has been a policy of the Department of City Planning to promote the production of housing and employment opportunities in urban centers that are well served by transit. The ultimate goals are laudable: promoting alternatives to private vehicles, reducing greenhouse gas emissions, and creating vibrant neighborhoods where residents can live, work

and enjoy their leisure time. But it does not appear that the City is, in fact, achieving the desired results, in part because it has failed to gather data and monitor outcomes.

As noted above, recent population data from the California Department of Finance shows that from July 1, 2019 to July 1, 2020, LA County saw a net loss of 40,036 people. This seems to suggest that SCAG’s growth projections need to be revised, and that the HCPU’s proposals for accommodating growth need to be revisited. But let’s take a closer look at the Hollywood area....

The 90028 zip code covers most of Central Hollywood, and corresponds roughly to the Regional Center outlined in the CPIO. This is also the area where the vast majority of residential and commercial development in the Hollywood community has taken place over the last decade. The graphic below shows 2015 US Census population and housing data for this area.

90028				
ACS DEMOGRAPHIC AND HOUSING ESTIMATES				
Survey/Program: American Community Survey		Product: 2015: ACS 5-Year Estimates Data Profiles		CUSTOMIZE TABLE
TableID: DP05				
ZCTA5 90028				
Label	Estimate	Margin of Error	Percent	Percent Margin
SEX AND AGE				
Total population	30,380	±1,174	30,380	
Total housing units	18,062	±255	(X)	

The next graphic shows population and housing data for the same area from 2019.

90028				
ACS DEMOGRAPHIC AND HOUSING ESTIMATES				
Survey/Program: American Community Survey		Product: 2019: ACS 5-Year Estimates Data Profiles		CUSTOMIZE TABLE
TableID: DP05				
ZCTA5 90028				
Label	Estimate	Margin of Error	Percent	Percent Margin
SEX AND AGE				
Total population	29,774	±1,174	29,774	
Total housing units	20,139	±386	(X)	

<b>90028</b>	<b>Population</b>	<b>Housing Units</b>	<b>Persons Per Unit</b>
2015	30,380	18,062	1.68
2019	29,774	20,139	1.47
<i>NET CHANGE</i>	<i>- 606</i>	<i>+ 2,077</i>	<i>- 0.21</i>

While the numbers show that the City has been successful in building more housing in Central Hollywood, the population density has actually declined. This appears to undermine the City's stated goal of focussing growth in urban centers to promote gains in transit ridership and active transportation. This also undermines the City's claim that dense new development has encouraged population growth near job centers. While the City has been very successful in luring large employers to the Hollywood area (including Netflix, MTV, Comedy Central, BET, VH1 and Spike), the numbers above show that the growth in jobs has not been matched by a corresponding increase in population.

#### Parks/Hollywood Central Park

The City claims that the Plan will help to address the need for park space accessible to Hollywood's neighborhoods, but it fails to offer many specifics beyond the proposed creation of the Hollywood Central Park, a cap park which would cover a segment of the Hollywood Freeway.

In fact, the Hollywood Central Park is an absurdly costly and impractical project that is unlikely ever to be realized. First proposed over a decade ago, since 2011 the City has spent over \$2,000,000 on an EIR for the Park that has still not been released. In 2014 it was estimated that the Park would cost \$1,000,000,000, and surely the actual cost has grown since then, but the City is currently dealing with a serious budget crisis which makes it unlikely the Park could be funded any time in the near future.

Because the HCPU relies heavily on the creation of the Hollywood Central Park, while offering no other meaningful proposals to create park space in Hollywood, the Plan fails to meet the community's needs for recreational space.

The EIR fails to adequately assess the impacts proposed new development could have on this area, which already lacks sufficient community-serving parks.

#### Solid Waste

The HCPU EIR claims that the proposed Plan will comply with AB 939, which requires a 50% diversion of solid waste to recycling. This is false. New multi-family and commercial development in the Plan area will be served by the Zero Waste LA Franchise System (formerly RecyclA). The "Zero Waste" System fails to live up to its name by a large margin.

Up until 2018, the City had been shipping most of its recyclable materials to China, but in that year China closed its doors to imported waste. Because of China's refusal to take our recyclables, at the beginning of 2019 the City revised its contracts for the Zero Waste/RecyclA program and revised its diversion target for 2023 down to 35%. This should make it clear that the City is currently NOT diverting 50% of solid waste collected and will be struggling to reach

that goal over the next decade. The City claims it's on the way to achieving a 90% diversion rate, but offers no data to support this claim.

Adoption of the HCPU and its associated CPIO could bring about significant new growth in the Hollywood Area, and therefore a significant increase in solid waste. The EIR fails to accurately assess impacts from the production of solid waste. Simply falling back on the claim that there is adequate landfill capacity to absorb additional waste is not enough. The EIR fails to state that the City is well out of compliance with AB 939, which requires California cities to divert 50% of their solid waste to recycling. Also, landfills are a significant source of GHG emissions, and the EIR fails to accurately analyze these emissions resulting from potential new development under the Plan.

The EIR falsely claims that the HCPU complies with AB 939. It offers no actual data on recycling of solid waste. It does not offer a realistic assessment of impacts from the failure to meet State-mandate recycling goals.

#### **APPARENT FAILURE TO COMPLY WITH LAMC SEC. 11.5.8.**

In 2016, as a result of the passage of measure JJJ, the following section was added to the LAMC:

##### *Section 11.5.8*

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

*1. Reduce the capacity for creation and preservation of affordable housing and access to local jobs; or*

*2. Undermine California Government Code Section 65915 or any other affordable housing incentive program; and*

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

The HCPU and the associated CPIO make significant changes to the Hollywood Plan Area. The CPIO offers massive density bonuses for residential projects in Central Hollywood. The vast majority of the housing in this area consists of apartment buildings subject to the RSO. While the City's claimed intent in offering generous density bonuses is to promote the creation of new affordable housing, it is certain that these incentives will also bring about the demolition of existing RSO units to make way for newer, larger projects, a process that has become commonplace in Hollywood over the last decade.

Because the adoption of the HCPU and the CPIO constitute significant material changes to the plan area, LAMC Section 11.5.8 requires the completion of a comprehensive assessment of proposed changes to ensure that such changes do not reduce the creation and preservation of affordable and RSO units. The City must also create and monitor an inventory of units within the Community Plan Area that are: subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the City Rent Stabilization Ordinance.

**LAMC Section 11.5.8 is clear in stating that no amendments or changes may be made until the completion of this comprehensive assessment by the Planning Department, including the creation of the housing inventory and the development of the monitoring program.**

**We have so far seen no such inventory among the materials made available in connection with the Hollywood Community Plan Update. If such an inventory has been completed, we ask that it be made available to the public before the CPC's consideration of the Plan and its associated components.**

# ATTACHMENT 3

March 17, 2021

City Planning Commission  
Department of City Planning  
200 N. Spring St.  
Los Angeles, CA 90012

Re: Hollywood Community Plan Update, CPC-2016-1450-CPU, ENV-2016-1451-EIR

Members of the City Planning Commission,

United Neighborhoods for Los Angeles (UN4LA) presents the following additional comments on the proposed Hollywood Community Plan Update.

Casey Maddren, President, UN4LA  
2141 Cahuenga, Blvd., Apt. 17, Los Angeles, CA 90068

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## **HOUSING**

In general, the policies and programs proposed in the HCPU with regard to housing are simply a rehash or expansion of the policies and programs that are already in place. The latest data on the LADCP Housing Progress Dashboard shows that from July 2013 to December 2020, of new units approved through entitlements, 87% were for Above Moderate Income households, with the remaining 13% divided among Moderate, Low Income and Very Low Income households. It should be obvious to the City that relying heavily on density bonus/TOC programs has led to a severe imbalance in the creation of new housing. Over this same period, the Los Angeles Homeless Count shows an increase from 29,682 in 2013 to 41,290 in 2020. These statistics make it clear that continuing to rely on existing policies will only lead to more of the same. With this in mind, we offer the following comments on the HCPU's housing policies and programs:

### **No Increase of Base Floor Area Ratio (FAR)**

UN4LA strongly opposes the increase of base FAR. The plan already offers generous incentives for new development. Increasing base FAR will add a further incentive to promote the demolition of existing housing to make way for larger projects. This will exacerbate the ongoing problem of displacement in Hollywood, which is well documented.

### **The Plan Must Include Real, Enforceable Anti-Displacement Measures**

While the City claims that the HCPU includes strong anti-displacement measures, in fact, it contains no concrete programs to minimize displacement. The proposed programs outlined in Land Use 5.10 through 5.15 merely state that the City will "encourage" the preservation of RSO units and the replacement of demolished affordable housing, and "support projects" that offer low-income tenants first right of refusal for new housing units. LU 5.14 says the City will decrease "displacement of current residents and strive for a no net loss" of affordable and RSO units without offering a single concrete proposal for accomplishing this. The HCPU must contain strong, well-defined programs that actually spell out how these goals will be accomplished.

### **Replacement Units Must Not Be Counted Toward Affordable Requirements**

When a project involves the demolition or conversion of existing housing, replacement units must not be counted toward affordable housing requirements for the new project.

### **A Conditional Use Permit (CUP) Must Be Required for Hotel Projects Which Involve the Demolition/Conversion of Housing**

Hotel projects which involve the demolition or conversion of existing housing, including TORS conversions/overlays, must be required to obtain a CUP. One of the conditions must be that all housing units are replaced, and rent-stabilized units must be replaced with affordable housing.

### **The HCPU Must Mandate Verification of Affordable Units by Inspection**

**All covenanted affordable units must be verified through periodic inspections by the Housing & Community Investment Department (HCID) to verify that the affordable units exist and are occupied by vetted low-income tenants.** In cases where the affordable units and low-income tenants cannot be verified, the Department of Building & Safety must revoke certificates of occupancy.

### **Ongoing Failure to Comply with Housing Element**

The first stated goal of the City of LA's Housing Element reads as follows: "A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs." The City has failed for years to meet this goal, and the policies outlined in the proposed HCPU are merely a continuation of existing policies. The proposed HCPU must also reinstate the following language from the 1988 Plan: "To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community [...]"

### **URBAN FOREST/AIR QUALITY/URBAN HEAT ISLAND EFFECT**

The HCPU discusses maintenance of street trees, but does not address impacts to the larger urban forest, which reduces temperatures and enhances air quality. The HCPU's generous incentives with regard to increased density and FAR, and also the incentives allowing reduced setbacks, will undoubtedly lead to a loss of tree canopy and green space without specific mitigation. This will increase the Urban Heat Island effect, which results from the replacement of permeable surfaces and plant life with hardscape. The loss of trees also negatively impacts air quality, which will cause health harms to area residents. Under Mandatory Findings of Significance, CEQA requires analysis of whether "The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." The one program related to the urban forest, P119, simply says the Plan will "Support City efforts to develop and implement sustainable urban forest plans [...]" This is not enough.

### **GENERAL PLAN MONITORING REQUIREMENTS**

A search of the HCPU reveals that the words "monitor" and "monitoring" only occur four times, and only with regard to housing production and traffic. The HCPU ignores the General Plan Framework requirement for monitoring programs to assess development activity and its impacts on infrastructure and public services. The HCPU is inconsistent with the Framework Element because it does not include mechanisms to ensure that new development will be supported by adequate infrastructure. Much of the water infrastructure in Hollywood is over 70 years old, and water main breaks are not uncommon. Parks have been underfunded for years and are severely degraded, while the proposed Hollywood Central Park is no nearer to completion now than when it was first proposed a decade ago. LAFD resources are strained due to the region's increasingly long and destructive fire season. Due to the current debate over law enforcement funding, it is difficult to project how LAPD will serve the area in the future, especially with increased population projected by the Plan. In general, the HCPU fails to comply with the Framework requirement for monitoring of infrastructure and public services.