

Communication from Public

Name: Kristin Leuschner
Date Submitted: 04/20/2023 09:21 AM
Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. I have lived in Southern California all my life and am the fourth generation of my family to live here. Over that time, the region has seen a lot of change, although the region has still retained a unique character. Many, if not most, of the buildings being constructed today have no character, nothing unique, and certainly nothing to connect them to the region's culture or heritage or even to help make LA and Hollywood a special place today. Historic buildings provide a link from the past to the present and the future and make our community unique, not just a generic space that could be anywhere. I strongly urge that you change the Plan in accordance with Hollywood Heritage's proposal. Sincerely, Kristin Leuschner

Communication from Public

Name: Toni Gurbel Tinkelman

Date Submitted: 04/20/2023 09:27 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. And I support these alterations more than somewhat!!!! Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. Please, I repeat, the built legacy of Hollywood is irreplaceable. I am from New York. We still regret losing Penn Station. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. There is no doubt this is true! We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Please, please, please!!! Sincerely, Ms. Toni Tinkelman Hollywood, CA

Communication from Public

Name: Wendy H Kaiser

Date Submitted: 04/20/2023 09:30 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Please take the time to preserve the unique, irreplaceable physical legacy of the area. Thank you for your thoughtful consideration. Sincerely, Wendy H Kaiser Smiles2all- Creative Projects

Communication from Public

Name: Timothy

Date Submitted: 04/20/2023 09:34 AM

Council File No: 21-0934

Comments for Public Posting: I understand the urgency of updating the community plan for Hollywood, but it is critical that protections for our historic resources are included in this plan. Please consider the changes that Hollywood Heritage is proposing. This is a once in a lifetime opportunity to protect the history of this special and unique neighborhood .

Communication from Public

Name:

Date Submitted: 04/20/2023 09:45 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. I worked in Hollywood for 20 years as well as still frequently being there to attend events ; its historic presentation is vital to its international image , which includes lucrative tourism.

Communication from Public

Name: Laura Dupuis

Date Submitted: 04/20/2023 10:31 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Laura Dupuis

Communication from Public

Name:

Date Submitted: 04/20/2023 11:19 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Celia Castevens
castcel@yahoo.com

Communication from Public

Name: Heritage Properties

Date Submitted: 04/20/2023 11:22 AM

Council File No: 21-0934

Comments for Public Posting: Heritage Properties submitted a review of the DEIR to City Planning which was not accurately reflected in the FEIR in our opinion, so we are resubmitting it herein. The EIR dates from before the redevelopment obligations were transferred from CRA to Los Angeles. CRA had been handed a large proportion of responsibility for identifying and protecting historic buildings, having obligations for 35 years, before transferring ALL those obligations back to City Planning. This HCPU EIR didn't factually analyze the repeal of the redevelopment plan itself,-- which is an Ordinance embedded in the HCPU,. Nor did it factually analyze the CRA Plan mitigation measures, and the loss of them. The Findings before PLUM in 2023 justify this based on a single quote from the redevelopment plan s--wherein CRA agreed update its land uses when City Planning completed the Update at the same time. That did not mean CRA agreed to cancel all historic building protections and all the design, traffic and other workings and obligations of the Plan.. At that time, the expectation was that both Plans and EIRS would adopt Land Uses at the same time, but if there was a small difference, the CRA Plan could be amended. CRA went ahead on time and adopted their Plan, with processes and procedures protecting historic buildings, PLUS Mitigation Measures. Now in 2023, AFTER LA accepted ALL CRA land use plans and functions back, this section is being twisted to justify repealing ALL of the redevelopment plan, AND removing current Mitigation Measures, and interconnected D and Q Conditions tying the two Plans together. That fails, and Appendix M fails. The DEIR is deficient because • the underlying Plan does not deliver on the stated goals, and the project described verbally is not the project delivered in the operative parts, • the DEIR sections “throw up their hands” in Appendix M and throughout, resorting to a Statement of Overriding Consideration instead of doing the needed analysis and mitigation measures required by law. • the legally-required elements of the Community Plan are not internally consistent in accordance with State law; and • a large number of Plan Elements, including Mandatory Elements under State law, show significant, “unavoidable” adverse impacts, when a Plan and planning can and should minimize or remove impacts AND including EIR Mitigations to minimize them. The

environmentally superior alternative is the "No Project Alternative" Loss of historic buildings is brought on by 3 things: by conflicting zoning, which incentivizes demolition when land is worth more than the buildings on it; by poor alterations, when stunning landmarks are remuddled – often unintentionally—because there is no design review process in place; and by incompatible new construction—generally out of scale, over-height, and often hostile to pedestrians and the humane existing environment. The major threat in this HPCU for Hollywood’s historic buildings is from upzoning, which is proposed in roughly 69 of 88 subareas of this 2018 Land Use Plan and zoning, combined with areas which are already zoned in conflict with historic buildings and neighborhoods. This upzoning is explained by an unsupportable mysterious circular logic on population and growth in the DEIR, out of line with all known guidelines and planning principles. • The Plan is supposed to be based on a population growth projection of about ½ of 1% of new people per year. From the current 208,000 dwellers, the expected growth is to 226,000 people. • The court case in 2014 rejected essentially the same Land Use Plan as being proposed now, with the same buildout capacity calculations missing, and with a similar odd reasoning and outdated population figures, with a Plan Text and EIR as “fundamentally flawed.” • However, because the Land Use Plan was largely created, circulated, cemented, and rationalized years before the population projections were fixed, there is literally no way to make the actual population growth consistent with this proposed Land Use Plan. • The existing 1988 Hollywood Community Plan, still in effect now, had a conservatively calculated Plan capacity of 272,000 persons. Experts have calculated it conservatively now at 470,000 persons, without a Community Plan Update. Thus, as explained in the attached letter, the existing Community Plan well over double the capacity to house the expected growth in both commercial and residential properties, without inducing new harm with the 2018 Land Use plan to historic buildings. • The existing 1988 Hollywood Community Plan brought growth near transit and met most of the current 2018 Plan Goals—except that it did not meet historic preservation goals. This Plan and DEIR failed to address that conflict and thus to explore genuine ways to save historic Hollywood from the wrecking ball. It is NOT necessary to “destroy the village in order to save it.”

Heritage Properties

Ms. Linda Lou, Community Planner
200 N. Spring Street, Room 667 mail stop 395
Los Angeles, CA 90012
Email: linda.lou@lacity.org

Dear Ms. Lou:

Our comments regarding the Draft EIR for the 2018 Hollywood Community Plan Update are being sent in this letter with 3 additional Sections of back-up information.

The HPCU has been issued by the City in 3 parts. This is our formal response to the Draft EIR, the 3rd and last part to be prepared. However, it is hard to entirely separate EIR comments from the 2 other parts: the Land Use Plan—which is the land use categories and proposed zoning that is the single part that actually becomes an Ordinance and is implemented as the Plan by Council action with the EIR; and the Plan text—a narrative description of background, intents, goals, and possible implementations.

This letter is Section 1. The remaining 3 Sections are attached.

SUMMARY OF COMMENTS ON HPCU DRAFT EIR REGARDING HISTORIC RESOURCES

THE HPCU Plan Text contains a trailblazing attempt to honor Hollywood's hugely important historic buildings, monuments, character, world-famous districts, etc. This may be the first ever Preservation Chapter for a Los Angeles Community Plan, and due to Hollywood's incredible history and amount of buildings, is richly deserved.

So the result of this HPCU was expected to be terrific progress for Los Angeles, but even an early reading of the Land Use Plan and the DEIR sees that this Plan is a giant step backward for preservation. The DEIR's comprehensive and detailed listings of historic landmarks was apparently prepared long after-the-fact of the Land Use Plan and zoning. This identification is followed by a shocking statement, literally that it is too much trouble for the City to do anything proactive beyond what it does today to protect this rich collection of buildings and districts. So unfortunately it will likely be lost.

This is unacceptable environmental review, and deceptive to decision-makers.

Loss of historic buildings is brought on by 3 things: by conflicting zoning, which incentivizes demolition when land is worth more than the buildings on it; by poor alterations, when stunning landmarks are remuddled – often unintentionally—because there is no design review process in place; and by incompatible new construction—generally out of scale, over-height, and often hostile to pedestrians and the humane existing environment.

The major threat in this HPCU for Hollywood's historic buildings is from upzoning, which is proposed in roughly 69 of 88 subareas of this 2018 Land Use Plan and zoning, combined with areas which are already zoned in conflict with historic buildings and neighborhoods. This upzoning is explained by an

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unsupportable mysterious circular logic on population and growth in the DEIR, out of line with all known guidelines and planning principles.

- The Plan is supposed to be based on a population growth projection of about ½ of 1% of new people per year. From the current 208,000 dwellers, the expected growth is to 226,000 people.
- A court case in 2014 rejected essentially the same Land Use Plan as being proposed now, with a Plan Text and EIR as “fundamentally flawed.”
- However, because the Land Use Plan was created, circulated, cemented, and rationalized years before the population projections were fixed, there is literally no way to make the actual population growth consistent with this proposed Land Use Plan.
- The existing 1988 Hollywood Community Plan, still in effect now, had a conservatively calculated Plan capacity of 272,000 persons. Thus, as explained below, the existing Community Plan has almost double the capacity to house the expected growth in both commercial and residential properties, without inducing new harm with the 2018 Land Use plan to historic buildings.
- The existing 1988 Hollywood Community Plan brought growth near transit and met most of the current 2018 Plan Goals—except that it did not meet historic preservation goals. This Plan and DEIR failed to address that conflict and thus to explore genuine ways to save historic Hollywood from the wrecking ball.

It is NOT necessary to “destroy the village in order to save it.”

We recognize that Planning has made efforts in “D” conditions to ameliorate damaging effects on neighborhoods and buildings, but these are attached to the Land Use Matrix in such a way as to be impossible to decipher. Seemingly there is no clear path for design review. The DEIR—in order to support statements about community preservation—must map, illustrate, and clarify where and why these lengthy urban design requirements are attached to the zoning of particular parcels.

It may all be spectacular—but it is presented in such an impenetrable way and disconnected from context and mapping that it can’t be seen.

The rationalizing of the Land Use Plan with strange population methodology in the DEIR is deceptive, but also in error. Housing and commercial construction has outpaced all the projections of the 1988 Hollywood Community Plan for a list of reasons—which are quantifiable, analyzable, knowable, and needed to be presented in the DEIR. Many many parcels in the Land Use Plan, including a few purported to be downzoned, have been built on since 2016 at greatly increased densities.

- Housing construction in Hollywood is now in large quantities on commercial and even industrial properties, whereas the 272,000 plan capacity in 1988 was calculated on residential properties only
- Discretionary actions by the Council overshoot even this 2018 Land Use Plan. Individual projects are often given 2x -5x 1988 Plan and even 2018 Plan zoning densities, creating lopsided, unplanned development scattered through Hollywood.
- TOC local law and granny flats local laws; SB 1818 density bonus housing: and a misinterpretation by the City of Zoning Code 12.22.A.18 (a Zoning Administrator interpretation allowing doubled density without environmental review) add up to immense pressure to demolish historic buildings and greatly accelerated housing production.

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Our conservative calculation is that the actual population capacity of the Hollywood Community Plan in 2040 is 330,000 people, based on the 1988 Hollywood Community Plan. As unpalatable as this discussion is, it is accurate.

DISCUSSION

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 DEIR carefully identifies the buildings in the Cultural Resources Section 4.5, and maps them:

- Federally identified buildings and districts (National Register buildings (37 buildings) and Districts, including the Hollywood Boulevard Commercial and Entertainment District (102 buildings) listed at the national level of significance);
- City-identified buildings CHMs (150 Cultural Heritage Monuments) and HPOZs (6 Historic Preservation Overlay Zones); and
- CRA-identified buildings and districts (1,000 structures surveyed in central Hollywood, in the Redevelopment area.)

Identifying significant historic buildings is always “step one”, so that Planning studies can integrate those historic buildings into the Land Use Plan and Zoning. The goals for Hollywood are crystal clear:

- Plan: The DEIR states in Sec 5.2 that a Primary Objective of the Plan is “protect historic and cultural resources”.
- Framework: A Primary Objective of the City’s overarching Framework Element which addresses housing issues is “Goal 3B “Preservation of the City’s stable single family residential neighborhoods” and Goal 3M “A City with significant historical and architectural districts”
- LA City General Plan Conservation Element: The Conservation Element of the General Plan policy requires that the City “continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.
- Draft HPCU Plan Text and Planning Dept handouts promote the Hollywood Community Plan Update as prioritizing preservation of the nationally and internationally recognized historic area.

Blueprint for near-total loss of landmarks: However, the Hollywood CPU Land Use Plan and zoning is actually a blueprint for near-total loss of Hollywood’s historic resources. “Loss” is both from demolition—usually incentivized by zoning which makes scraped land more valuable than the building itself; by bad alterations—remodellings, additions, and other changes removing the features which made a building significant; and incompatible new surroundings. ALL are highly preventable.

The HPCU DEIR concludes there isn’t anything to be done to keep the important and increasingly rare historic buildings standing—not a single change to the Land Use Plan proposed, or a single legally-required mitigation. The “win win” of the Hollywood Community Plan should be the artful and detailed integration of all Plan goals. Hollywood’s heritage cannot be the casualty—intended or unintended.

DEIR says Land Use Plan is what matters, cultural resources do not: This Land Use Plan is the portion of the Community Plan that matters—it is what is actually gets adopted by the Council as Ordinances.

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- The DEIR states in Sec 5.3 under that “after implementation of all feasible implementation measures”, the adverse effect on Cultural Resources: Historical Resources is “significant and unavoidable.”
- The DEIR states on Page 4.5-48 “No feasible mitigation measures have been identified”, citing the fact that no City or other ordinance (such as CHMs, HPOZs, etc or proposed CPIO) prevents demolition if projects go through proper review. “Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes to projects involving historical resources that are designated under the HCM or HPOZ, or subject to review by the proposed CPIO or SNAP, or other discretionary review. Based on the above, there is no feasible mitigation to prevent the demolition or substantial alteration of historical resources.”
- Translated, this means “the City” has decided historic buildings do not matter.

Conclusions backed by no analysis or effort to change adverse effects: In the Land Use Plan, zoning, and the DEIR, there is no apparent effort visible that Planning worked to direct or inventively regulate growth in Hollywood around cherished and spotlighted historic buildings. This may not be the Planning Department’s intention, but in the lengthy documents, no map, sentence, or other part of the plan which will become law makes any other intention evident..

First and foremost, the Land Use Plan and any regulations focus on new construction, in this heavily built out dense urban landscape. Secondly, the Land Use Plan and zoning appears to miss the opportunity to bring to the richly endowed area such normal planning tools as adaptive re-use or measures to disincentivize demolition such as compatible additions to single family homes to increase density; parking relief; or requirements to maintain and reuse streetfront buildings contributing to a cohesive streetscape.

The DEIR maps in Section 4.5 make a good first-time effort to show known historic buildings. Unfortunately the historic buildings were identified and mapped for the EIR maybe 6 years after the Land Use Plan, zoning, and the Plan Text were developed, cemented, and circulated:

- Conflict mapping with Green HPCU zoning subareas: Maps in Sec 4.5 show proposed HPCU subareas in green, overlain on the maps of historic buildings. There is no explanation or analysis. 90% of the proposed subarea zoning changes are upzoning, so the conflicts are likely huge, should have been highlighted, and real steps taken to correct the problem. Examples abound-- such as the Selma La Baig District, recognized as of National Register significance—an upzoning proposal on an already upzoned district.
- No conflict mapping for 1988 Community Plan conflicts: The DEIR has no analysis of the existing Community Plan’s conflicts with historic buildings. This Community Plan was the golden opportunity to “catch” areas not identified for conflicts in 1988, and downzone or otherwise design control those areas to make for healthy communities and preservation.
- Silence on the Hollywood Boulevard District: It appears that the Planning Department intent was preservation-minded- to leave the current zoning limit of a 2:1 FAR for the central section of the historic Hollywood Boulevard District intact. However, the “D” condition was always tied to planning studies required from CRA. That work is being completed, and the consultant/City/ or CRA must be instructed to implement the 30% reduction written into the Redevelopment Plan to keep the allowable FAR at 2:1.

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EIR IS DEFICIENT

This writer finds that the loss of Hollywood itself – its physical patterning, homes, and commercial areas—is avoidable, and this DEIR is deficient. The conclusions of the Draft EIR on Cultural Resources; Population, Housing, and Employment; Transportation and Traffic, and other sections is not supportable. We find that there countless ways to plan for growth AND preservation, are many, many known and possible mitigations.

The DEIR is therefore deficient because

- the underlying Plan does not deliver on the stated goals;
- the DEIR sections “throw up their hands” and fail to address how this disconnect between goals, legal requirements, and the proposed Land Use Plan can be resolved.
- the legally-required elements of the Community Plan are not internally consistent in accordance with State law; and
- a large number of Plan Elements, including Mandatory Elements under State law, show significant, “unavoidable” adverse impacts, instead of planning to minimize or remove impacts AND including EIR Mitigations to minimize them.

We find it laudable that the EIR takes the first step to identify historic resources. We believe that this Community Plan is a major step forward for the City of Los Angeles in having a Preservation Chapter, which we recommend be officially recognized as an Optional Community Design Element under State General Plan law.

But, the obligation is not to put forth goals and let the chips fall. The obligation is to develop a Land Use Plan and zoning that integrates, protects, promotes investment in, and supports historic resources with infrastructure and services.

It appears that the Land Use Plan and zoning proposed is closely tied to the same Land Use Plan Judge Goodman rescinded in 2014, citing it as “fundamentally flawed” and rejecting the Land Use Plan, zoning, Plan Text, and FEIR. In the ensuing 4 years, it does not appear that any effort was made to integrate historic resources into the Land Use Plan; upzones ostensibly for transportation and sustainability reasons in direct conflict with certain State ordinances; and fails to attempt to mitigate the losses.

This Community Plan deserved to have its stated and touted goals and policies resolved and reflected in the Land Use Plan.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE IN EIR IS THE NO DEVELOPMENT ALTERNATIVE:

The “No Development” Alternative offered in the EIR does not mean “No Development”—it is actually simply a continuation of the current 1988 Community Plan, which has given rise to a phenomenal amount of development!

If the proposed HPCU Land Use Plan and zoning brings with it significant adverse and unavoidable impacts, it is environmentally superior to re-visit the Plan and re-plan the proposal for Land Uses. But the alternative of doing land planning is not offered in the DEIR, so the “No Development” alternative must be selected as environmentally superior.

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Unpalatable as it is, this 2018 HPCU is a giant step backward, clothed as progress. There are 5 fundamental reasons:

1. **Population projections are always the foundation of Community Plans, and the EIR wrongly manipulates the projections:** Population projections are the first step in a Community Planning process. What is the future need for housing and employment (a.k.a “growth”)? It derives from how many people are expected to be in the area, and simple formulas determine how many housing units or square feet of neighborhood or regional commercial construction are needed to serve those people. The Land Use Plan must then determine where to locate that added construction, while brilliantly accommodating myriad goals.
 - DEIR says 226,000 people: Hollywood’s portion of that growth was studied seriously as a precursor to planning. The DEIR cites population at 2040 to be 226,000 people. Multiple census and demographic sources have confirmed this number beyond the DEIR.
 - The Department of Finance appears to have computed 226,000 people, and the Regional Transportation Plan/Sustainable Communities Strategy/SCAG calculated 233,236 people. SB 375 requires that if a difference between the two is over 3%, in the absence of a formal negotiation the figure is the DOF’s—or 226,000 for Hollywood..
 - Growth: Over the next 26 years, Hollywood is expected to add 23,000 people over the 2016 population of 203,000 , or 884 people added per year. This is growth of less than ½ of 1% per year.
 - DEIR Section 4.1.3 uses unacceptable circular reasoning . The DEIR tries to justify higher population figures because the Land Use Plan being proposed and the TOC regulations put forth by the Planning Department induce growth. The result is unacceptable-- Land Use Plan (plus all the “uncounted” housing capacity explained in Section 4) creates capacity for much more construction than this population needs, but that certainly does not justify the City argument that the population “must” grow higher.

2. **It appears the entire housing need for Hollywood for the year 2040 has been met/is being met by current permits and entitlements**
 - Residential capacity for the Community Plan Area: For the year 2040, Linda Lou stated 9,000 new housing units are needed, or 450 units per year. (Linda Lou stated that City Planning is using a really low 2.0 persons/dwelling unit in Hollywood at the HPCU Open House)
 - Commercial: The logic of the commercial zoning proposed in the 2018 HPCU seems to be missing from the DEIR. We reserve the right to keep looking for it and add comments later.
 - Current permits and entitlements: The needed residential development for Hollywood for the year 2040 has mostly already been entitled, if not under construction. From 2016—the year of the EIR figures—through 2018, we calculated at least 3,154 units, and from permits and entitlements an additional 6,628 more.
 - Section 4: This topic is developed in Section 4 attached to this Letter.

3. **The current 1988 Community Plan has growth capacity far above anything needed for the year 2040:**
 - The DEIR never displays a credible methodology for calculating capacity for housing construction created by adding the proposed upzoning in the 2018 Land Use Plan to the current 1988 Community Plan.

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- In 1988, the Community Plan calculated housing only on residentially zoned land, and concluded that the plan's build-out capacity—very conservatively calculated—was at 272,000 people.
 - The current remaining 1988 Hollywood Community Plan Capacity on residentially zoned land alone is likely 15,000 – 18,000 units, using data obtained on permits issued since 1988.
 - The actual 1988 Plan housing capacity is much higher due to:
 1. Commercial zones: housing is being built on commercial and industrially zoned lands in the recent decade in large quantities . (Plan Capacity in 1988 was calculated on residential zones alone.)
 2. Discretionary actions: The City is continuously approving projects at 2 x to 5x zoning limitations, often even 2x or 3x the density of this not-yet-approved Community Plan continuously by the City
 3. SB1818: A 35% density bonus is allowable for projects offering 10% low income units
 4. Granny Flats: Single family homes on single family zoned land may add an extra dwelling unit (except in Hillside areas)
 5. TOC projects: Pursuant to Measure JJJ, City Planning promulgated rules allowing varying density bonuses—up to 80% in central Hollywood
 6. C4 properties having R5 densities: A misinterpretation of the Zoning Code 12.21.A.18 has enabled multiple projects to double residential units if providing commercial amenities. One project was shockingly awarded 100 bonus units (a doubling) for 936 sf of commercial area. The Palladium project was allowed to double density although R5 density was entirely eliminated in the 1988 Community Plan and no Variance was obtained.
 - With conservative calculations, if the DEIR worked these factors on Land Use capacity in the proposed plan backwards, the Plan would accommodate 330,000 people. This is computed using figures from the DEIR Chapter 3.
4. **Community Redevelopment Agency's responsibilities and obligations for historic preservation in Hollywood, and potential transfer of obligations to City Planning, are omitted and glossed over:** The HPCU and its EIR gloss over 30 years of planning history in the central 1,107 acres of downtown Hollywood by dismissing the long standing activities of the CRA. The EIR fails to mention that the CRA
- was only allowed to have more restrictive zoning;
 - had all responsibility for Central Hollywood design review and design quality, even including Site Plan review for the City until last year;
 - had all responsibility to keep infrastructure capacity calibrated to new construction
 - had responsibility for identifying and protecting historic buildings, with long lists of detailed responsibilities.
 - Prepared detailed transportation and parking surveys and plans dealing at a fine-grain urban design level critical for Hollywood

The DEIR points out one single section of the Redevelopment Plan. It's the one section in 30 years that was changed-- to mandate that if the City processed this new Community plan, the amendment had to be adopted by CRA. This was due to the fact that the CRA completed its required Plan Amendment on time, and the City's HPCU is still under consideration 13 years later.

Heritage Properties

5. **CPIO is unfinished, but as offered it is a giant step backward for historic preservation:** The Community Plan offers a CPIO in the Hollywood Redevelopment Area.
- The zoning designation of CPIO is contained in the Land Use Plan, and thus is the only mandatory part of the Plan which the City Council will adopt.
 - The Plan Text and DEIR fail to state the purpose – that this CPIO is needed to carry forward historic preservation obligations in the event the City Planning Department takes over the CRA’s land use obligations.
 - The CPIO was expected to be attached to all parcels in the CRA (Redevelopment Plan) area of Central Hollywood, and is still under development and consideration.
 - The current Draft CPIO requires alterations of only commercial properties only to be reviewed by the City, and only for Federal and City-designated resources,

MITIGATIONS

Mitigations are Possible, Required by California law to be implemented , but omitted from 2018

HPCU DEIR: The DEIR 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.” No Mitigation Measures are offered!

- California General Plan law requires minimizing adverse impacts to the extent feasible.
- The Redevelopment Plan EIR in 2005 concluded that the CRA had authorities and obligations which provided mitigations sufficient to protect historic buildings, and for the same population of historic buildings concluded no significant adverse effect.
- Those obligations, processes, and protections are still in place.
- As noted below, the Plan itself in the text cites Implementations which could be required as Mitigation Measures as well.

Our Section 3 attached reviews a long list of current mitigations that CRA employs to protect historic resources, and other possible further mitigations. THE DEIR is totally unacceptable in its Cultural Resources analysis.

GENERAL COMMENTS ON THE RELATION OF EIR TO LAND USE PLAN AND PLAN TEXT

Disconnect with 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.

Heritage Properties

Our Section 2 reviews the goals, policies, and implementation measures. Given the dire situation already in Hollywood, we recommend a proactive push to get these and other implementation measures baked into the Community Plan and its zoning before presenting this to the Planning Commission.

Disconnect with the Mandatory Community Plan Land Use Plan: One part of the HPCU -- 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, generally incentivized by a higher density zoning overlain on existing neighborhoods or areas of lesser average density.

- The 1988 Community Plan already in force 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. That has not been attempted.
- 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.

Respectfully submitted,
HERITAGE PROPERTIES

Frances Offenhauser

**Draft Hollywood Community Plan
Update 2018**

**Response to Draft Plan and Draft EIR
Section 2**

HPCU Plan Goals- what implementation?

Frances Offenhauser, Heritage Properties
Updated Jan 2019 for review of Nov 2018 Draft

Background:

The Hollywood Community Plan Update (HPCU) Draft Plan Text states goals, policies, and implementation projects regarding historic preservation.

- The only mandatory part of a Community Plan is the Land Use Plan. The Land Use category and zoning (density, uses, heights etc) assigned to each land parcel are the Plan. If a CPIO covering historic preservation is a part of the zoning for certain parcels, it will be mandatory as well.
- The current Draft Text goals, policies, and implementations noted below are aspirational. They are intended to guide Planning and other departments in their future priorities, discretionary actions, and decisionmaking.
- If a goal or policy is not carried through now in the zoning that is proposed to be adopted, then, for now, that goal or priority is not being carried out as a part of the adoption of this proposed Community Plan. It is being recommended for the future.
- The HPCU Plan Text issued November 2018 replicates most of the Text for 2017. Fran Offenhauser circulated this review at that time as a member of Hollywood Heritage ..

A. Goals stated– Plan summary says HPCU promotes preservation—what in the zoning makes this true?

- “Expands historic resources protection in Hollywood” -
- “Supports the establishment and expansion of historic districts, including expansion of the Melrose Hill Historic District
- “Links the use of incentives to historic preservation, and requires conformance with the Secretary of the Interior Standards

B. 2017/8 Draft Text- Preservation Goals, Policies, and Implementation

Goal P.1: Honor Hollywood’s legacy through the preservation of the built environment that reflects Hollywood’s cultural, social, economic, and architectural history.				
	Policy	Implementation – listed as Short Term	Timing- Short term	Timing Needed?
P 1.1	<u>Significant neighborhoods and districts.</u> Support the preservation of culturally and historically significant neighborhoods and districts.	<ul style="list-style-type: none"> • P28 Current HPOZ protections and new HPOZs • P29: Develop Los Feliz HPOZ • P30: Sunset Square HPOZ(!) • P31 :Study expanding Melrose Hill HPOZ 	<p>DCP ” No commitment to timing Note: p30- Sunset Square HPOZ is adopted</p>	<p>CPIO Prior to Plan Adoption—Add Vista del Mar, Ivar Hill. Colegrove, Hollywood North Multifamily, 1700 Hudson, etc</p> <p>Connect to CRA Redev Plan</p>
P 1.2	<u>Adaptive reuse.</u> Promote the preservation and adaptive reuse of existing building stock,	<ul style="list-style-type: none"> • P65: Improve and streamline rehabilitation with “early” advice 	DCP and LADBS	Connect to CRA Redev Plan

	especially for designated or eligible historical resources.	and guidance from DCP and LADBS	Unclear actions and timing	
P 1.3	<u>Designated and potentially significant resources.</u> Preserve designated Historic Cultural Resources and further study eligible resources as potentially significant resources.	How? No policies or implementation provided	No implementation process or specific timing	Prior to Plan Adoption— extend CHM protection to all National Register properties (Ken says this is already being done?) list all buildings required in 1990 as HCMs now
P 1.4	<u>Buildings in FAR Incentive Areas.</u> Protect designated historical buildings, including those which are located within Floor Area Ratio (FAR) Incentive Areas and multi-family residential areas where the Plan restores citywide standard R4 density – red is unclear	<ul style="list-style-type: none"> • P32 Establish zoning which conditions a project’s use of Floor Area Incentives upon conformance with Secy Int Stds • P33. Study the feasibility of TDR Hollywood program 	DCP- No implementation process or specific timing	Prior to Plan Adoption— Connect to CRA Redev Plan
P 1.5	<u>Distinctive street features.</u> Protect distinctive features of prominent streets in Hollywood, such as the Walk of Fame, a recognized Historic Cultural Monument of the City of Los Angeles.	<ul style="list-style-type: none"> • P34: Maintain Walk of Fame designation, dimensions • P66: Rehabilitation Plan for Walk of Fame 	DCP/BOE/DOT- Clarify and report existing process and procedures, No process or timing proposed	Add significant streetscapes—Cahuenga, etc, as identified by CRA survey
P 1.6	<u>Study preservation tools.</u> Support the study of Residential Floor Area (RFA) Special Districts, Community Design Overlays (CDOs), or a Community Plan Implementation Overlay (CPIO) for neighborhoods that retain a cohesive character but are not eligible to become Historic Preservation Overlay Zones.	How? No policies or implementation provided		Prior to Plan Adoption— Commit to neighborhood protection—develop excellent tools and include Extend CPIO to residential neighborhoods Connect to CRA Redev Plan
P 1.7	<u>Preserve designated resources.</u> 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	<ul style="list-style-type: none"> • P35: 2017 Use Secretary of Interior Standards for “any development project” • P 35: 2018 Establish regulations “D” limitations to ensure appropriate review of historic resources 	DCP-	Prior to Plan Adoption— Add Preservation Brief #14 Follow up on conflict mapping- evaluate, create new Land Use and zoning controls parcel by parcel or some other way?
P 1.8	<u>Complementary design.</u> Encourage the design of new buildings that respect and complement the character of adjacent historical resources through design standards ..such as CDO, CPIO	<ul style="list-style-type: none"> • P36- Use Citywide Design Guidelines for new and infill development • P37: Study Rodney/Lyman/Alley 	DCP No process or timing proposed	Prior to Plan Adoption— Connect to CRA Redev Plan <i>Hollywood Blvd Urban Design Plans, etc</i> Add Preservation Brief #14

		<p>for potential historic significance</p> <ul style="list-style-type: none"> ● P38: Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character 		
P 1.9	<p><u>Land use and zoning.</u> Maintain appropriate General Plan Land Use designations and zoning in existing historic districts which are either listed in, or are eligible to be listed in the National Register of Historical Resources. Promote infill development that matches the scale of historical resources within each district, including the following: height, massing, setbacks, stepbacks, and development pattern</p>	<ul style="list-style-type: none"> ● P 39: Study Afton Square, Selma Le Baig, Serrano 	DCP- No process or timing proposed	<p>Prior to Plan Adoption— Revise all proposed land use designations due to conflicts Hollywood Core Transition by CRA affects Afton Place Hollywood Boulevard most important National Register District Require use of Preservation Brief #14 Extend HPOZ protections and procedures immediately Prohibit parcel assembly Strong development limitations and override of TOC needed urgently</p>
P 1.10	<p><u>Height limits.</u> Maintain height limitations on commercial zones that border designated or eligible historic neighborhoods. Encourage the design of new buildings that respect and complement the character of adjacent historic neighborhoods.</p>	<ul style="list-style-type: none"> ● P40: Study heights at Sunset and Western 	DCP-	Prior to Plan Adoption—
P 1.11	<p><u>Financial resources.</u> Support efforts to identify financial resources for rehabilitation of historical resources. Promote the use of the City’s Mills Act Historical Property Contract Program, the Federal Historic Rehabilitation Tax Credit, and the California Historical Building Code</p>	<ul style="list-style-type: none"> ● P67: Partner with HCID to rehabilitate housing 	DCP, HCID	Commission economic study
P 1.12	<p><u>Documentation.</u> Support opportunities to document Hollywood’s history and architectural legacy and share that history with the community.</p>	<ul style="list-style-type: none"> ● P41: Support and complete Historic Places LA ● P68: Neighborhood councils and preservation organizations 	DCP-	<p>Ongoing Improve public access through upgrades to ZIMAS etc</p>

**Draft Hollywood Community Plan
Update 2018**

**Response to Draft Plan and Draft EIR
Section 3**

**How to Integrate Long-standing CRA Obligations for Historic Buildings
Into City Planning Obligations**

Frances Offenhauser, Heritage Properties
Updated Jan 2019 for review of Nov 2018 Draft

A. Current CRA Mandates to Identify and Protect Historic Buildings

			Comm. Plan Draft?	Succeed/Fail Today?
1	CPC 86-835 GPC Cultural Heritage	Historic Listing and Protection Requirement: Affects 134 landmarks. CRA was required in this case to list all National Register Status Code 1-3 buildings as Cultural Heritage landmarks, affording Cultural Heritage permit reviews. CRA allegedly sent the list—City failed to list. City created a ZI (ZI 1812) so that Plan Checkers send applicants back to CRA. The City has not met its obligations for 30 years. Is City reviewing plans for all of these buildings? What is the permit clearance flagged as?		CRA submitted to City
2	Redev Plan— CRA- Sec 511	Listing/Public Information: CRA identified 1,078 known landmarks at outset of Chattel survey “Agency ..shall maintain publicly available list of all buildings within the Project Area which it determines to be architecturally and/or historically significant.		
3	Redev Plan— CRA- Sec 511	Protection requirement- delay of any kind of permit/ delay of demolition: Buildings listed by CRA, CHM, CHRIS, and National Register deemed to be or architectural significance; procedures for design review for alterations and for delay of demolition for 180 days process, extendable to 360 days.		
4	Redev Plan— CRA- Sec 511	Scorched Earth- bonus denial: “ The Agency shall deny requests for housing incentive units, development in the Regional Center Commercial designation above an FAR of 4.5:1 and variations for sites on which a structure determined by the agency to be significant was demolished after the adoption of this Plan or is proposed to be demolished”. (Note exempts SB 1818 increase)		
5	Redev Plan CRA 2003 EIR	Listing/Public Information: 2003 EIR identified and extended protections through Mitigation Measures to 448 landmarks_“In order to not report any significant effect under CEQA, the mitigation measure states “Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior Standards for Rehabilitations”.		
6	CRA-HHI Settlement	Protection requirement- delay of any kind of permit/ delay of demolition: In absence of CRA meeting obligation for completed historic survey and listing, established process for CRA to consult with Hollywood Heritage on status of any building having a demolition permit application, and invokes delay of demolition for building		

B. Current CRA Mandates for Design Review of Alterations, Heights and Density, and Effects of New Construction

	Redev. Plan		Comm Plan Land Use/ Draft?	Succeed/Fail
1	Redev Plan—CRA- Sec 409:	Design Review: All rehabilitation undertaken in the Project Area..determined by the Agency to be or architectural and/or historical significance shall be rehabilitated in accordance with the Secretary of the Interior Standards		
3	Redev Plan—CRA- Sec 505.4 and 506.3:	Design/permit review: Agency must review commercial uses in residential areas and residential uses in commercial areas		
4	Redev Plan—CRA- Sec 506.2.1	Design Review: Hollywood Boulevard District Urban Design Plan required in 5 years, including design guidelines, may include a reduction of density up to 33%		
5	Redev Plan – CRA Sec 407.1.4	Design Review: All development plans (whether public or private) shall be subject to review and approval by the Agency		
5	Redev Plan- CRA Sec 505.1	Design review for any project exceeding 80 du/acre		
6	HHI Settlement Agreement B3	Follow 1993 Urban Design Plan “Until the deadlines stated in this Agreement for the preparation of an update of the 1993 Design Plan have been met, CRA/LA agrees that any new project...in the Hollywood Boulevard Urban Design Plan area shall be subject to review by CRA/LA, which review shall include without limitation ...the 1993 Design Plan, until the deadlines stated in this Agreement for preparation of an update of the Plan have been met. CRA/LA shall distribute the 1993 Design Plan to all new project applicants”		

C. Mitigation Measures for HPCU EIR

			Comm. Plan Draft?	Today?
1	Redev Plan CRA 2003 EIR	EIR review: Projects proposed in proximity to a cultural resource “the Agency will require a study to be made by a qualified architectural historian to determine whether the proposed development would result in substantial adverse change in the significance of the historical resource		
2	Redev Plan 2003 EIR	Design Review Mitigation Measure: “In order to not report any significant effect under CEQA, the mitigation measure states “Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior Standards for Rehabilitations”. This restates the requirements in the Redevelopment Plan		

D. Mandated CRA Obligations re Incentives/ Affirmative Actions/ Land Use Limitations

Redev. Plan		Comm Plan Draft?	Succeed/Fail
Redev Plan—CRA- Sec 505	Planning: Any residential area with architecturally or historically significant structures may be further planned to reduce allowable density, require compatible design, ensure adequate parking, and conserve structures		
Redev Plan – CRA Sec 505.3	Limits on Housing Incentive Units: Agency will limit housing incentive units		
Redev Plan—CRA- Sec 511	TDRs “The Agency shall promulgate procedures for such transfer proposals(and shall) obtain adequate assurances that the building from which the density transfer is taken are preserved and the development on the site to which the density is transferred will occur in conformity with the Redevelopment Plan, the objectives of special districts as established by the Plan and if applicable, any adopted Design for Development”		
Redev Plan—CRA- Sec 506.2.3	Monitoring traffic: Required to make annual reports on buildout of FAR in Regional Center relative to traffic metrics; required to review all density increases above 4.5:1 and when Regional Center density reaches 2:0:1 FAR to establish specific methods and mechanisms to acquire open space or otherwise restrict or decrease density		
Redev Plan—CRA- Sec 518 and 518.2	Transportation Planning: Plan required, including planning to ameliorate undersupply of parking in Hollywood Boulevard. Agency to monitor off street parking supply		

E. Are Current City Planning Mandates for Identify/Protect Historic Buildings in 2018 Draft Community Plan EIR?

			Comm. Plan Draft?	City Succeeds/ Fail Today?
1	City Planning Affidavit	Hold on demolition: Planning agreed December 16, 2016 with Hollywood Heritage that they can and will institute an Affidavit Process—Applicants will be required to sign a statement indicating “This permit (including every demolition permit) request is not a part of a larger project.” . This is to stop the common practice be certain developers for piecemealing, which violates CEQA.	Not included	
2	Cultural Heritage Ord	Listing/Public Information/ Protection requirement: Listing of Cultural Heritage monuments (mapped on Navigate LA); Building permit review for alterations. Possible delay of demolition	Yes	

3	HPOZ	<u>Listing/Public Information/Protection:</u> Listing of single family neighborhood HPOZs outside of Redevelopment Area.	Yes	
4	HPOZ's under consideration	<u>Listing/Protection:</u> Listing of new single family neighborhoods proposed outside of Redevelopment Area	Hollywood Grove and Sunset Square were already completed	
5	Comm Plan 1986	<u>Protection:</u> TDR and preservation as justification for 6:1 FAR		
6	Comm Plan 2012	<u>Protection:</u> (Areawide) "D" Conditions on parcels with historic buildings	Unclear-	
8	General Plan Conserv Element	<u>Listing/Protection</u> <ul style="list-style-type: none"> • <u>City Planning and LADBS:</u> Development permit processing, monitoring, enforcement, and periodic revision of regulations and procedures • <u>Element:</u> Prepare the Historic Preservation and Cultural Resources Element of the Community Plan • <u>Identify:</u> Continue to survey buildings and structures... including context • <u>HPOZs</u> 	DEIR- yes Not yet re-integrated into the Plan Text- especially recognition of Redevelopment Plan resources	
9	2018 Comm Plan DEIR	<u>Listing/Public Information</u>	Yes –	
10	2018 Comm Plan DEIR	<u>Conflict Mapping, Analysis, and actions to reduce impacts</u>	Yes- some conflict mapping No – Analysis and actions	

F. What are additional Mitigation Measures possible for the 2018 HPCU, in addition to adopting all of the CRA protections :

			Comm. Plan Draft?
I	<u>Clarify public benefits:</u>	The cornerstone of CRA's authority for discretionary approval of high densities in the 2005 Redevelopment Plan is intended to be twofold: traffic and parking mitigations, and a Transfer of Development Rights Program. City Planning cannot approve discretionary higher densities without providing the public benefits which are critical to the Hollywood Community.	

2	<u>New Historic Preservation Overlay Zones</u>	CRA surveys over the years identified specific historic residential districts. These CRA districts should be reflected as potential HPOZ areas in Community Plan mapping and the EIR. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.	No
3	<u>Historic Cultural Monuments</u>	The Hollywood Community Plan adoption by the City Council in 1986 required that roughly 100 National Register and other listed historic buildings be forwarded by CRA to the Cultural Heritage Commission for listing as HCM's at the City, and for notification of the CHC in the event of proposed demolitions. CRA met its obligation and City Planning did not implement. The EIR must reflect this current non-compliance. The City agreed in 2009 again in a formal Settlement Agreement. This list included the ID buildings—as contributors.	No
4	<u>Mapping of "protected" historic buildings, and notification of planned demolitions:</u>	There is a currently-adopted list of CRA buildings, with Status Codes 1-4 protected by the Hollywood Redevelopment Plan, including recognition of these buildings in EIRs. These addresses must be transferred, mapped, and protected by City Planning and reflected in the EIR. In addition there is an interim procedure set by judicial action wherein Hollywood Heritage is consulted on planned demolitions for Status Codes 1-6 within the Redevelopment Area.	City Planning has started with a ZI to identify buildings
5	<u>Interim Control Ordinance immediately:</u>	The Hollywood Boulevard National Register Commercial and Entertainment Historic District will need an ICO to give the Planning Department time to follow up on the court-mandated CRA Urban Design Plan, and to work to conform the zoning categories with current protections. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.	No
6	<u>Prohibition of Demolition</u>	Step two	No

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G. **What are the CRA current Plans being prepared that are going to have Implementation by City Planning in the future?** City Planning is working on this issue.

	Thoughts for long term implementation
<p>Franklin Avenue Design District Plan</p> <ul style="list-style-type: none"> Redevelopment Plan Reqts: Sec 505.2: “a detailed design plan ...which addresses preservation of architecturally and historically significant buildings, parking, circulation, views...” 	<ul style="list-style-type: none"> Community Plan to adopt HBUDP as a Specific Plan?
<p>Urban Design Plan Hollywood Boulevard Historic District</p> <ul style="list-style-type: none"> Redevelopment Plan Reqts: Sec 506.2.1 and 518.2; “urban design plan including design guidelines and criteria and a parking and circulation program to meet these objectives..All new development in the District shall meet the design guidelines..may include a reduction of density” 	<ul style="list-style-type: none"> Community Plan to adopt HBUDP as a Specific Plan—Integrate into Community Plan and change current D condition to permanent 2:1 FAR Until HBUDP adopted, HHI Settlement Agreement requires all projects proposed for alterations, demolition, building permits, or discretionary actions to follow 1993 UDP as follows: enforcement through CRA Interim mandated review as a part of all building permit and Planning applications; any environmental review to evaluate projects covered by 1993 UDP in all details and guidelines
<p>Hollywood Core Transition District Development Guidelines</p> <ul style="list-style-type: none"> Redevelopment Plan Reqts: Sec 506.2.2.: “properties...shall be given special consideration due to the low density..provide for a transition in the scale and intensity of devt” Redev Plan Sec 506.2.2 “The Agency shall review all permits in this District to ensure that circulation patterns, landscaping, parking, and the scale of new construction is not detrimental to the adjacent residential neighborhoods.” 	<ul style="list-style-type: none"> HHI prepare a list of conditions for any development affecting the residential neighborhoods for adoption by CRA Incorporation as “D” conditions in Community Plan Zoning for affected properties
<p>Transportation and Parking Standards Ordinance</p>	<ul style="list-style-type: none"> Integration of iteris studies into Community Plan and EIR City Planning to perform CRA annual reports Fund CRA completion of 2:1 calculation for Regional Center

<p>Updated Cultural Resources Survey</p> <ul style="list-style-type: none"> • <u>Settlement Agreement Req't</u>: “maintain consistency with Survey LA and its definitions...recognizes that integrity may be evaluated differently in Hollywood area due to rarity, property type” 	<ul style="list-style-type: none"> • Parking study and review • CPIO in Community Plan to include all CRA addresses • However, Hollywood and CRA reserved right to alter standards of integrity. • All “lowering” of status codes to be reviewed for loss of integrity; if loss of integrity due to remodeling since date of initial higher survey listing, or due to non-Hollywood integrity description in Survey LA • Review Hollywood Boulevard District with reference to 2014 submittal to State Office of Historic Preservation; HHI to provide review and map of existing District boundary (which is 35 years old) and proposed District boundary and contributors. New contributors to be identified with a ID; non contributors to be identified with a ZI—subject to Sec 511 procedures
<ul style="list-style-type: none"> • <u>Redevelopment Plan Req't</u>: Publicly available list • <u>Settlement Agreement Req't</u>: Publicly available list “uploading to CRA website is acceptable” “a printed version of the Section 511 list shall be provided to members of the public on request and at reasonable copying charges” <p><u>Background:</u> Preservation.lacity.org\SurveyLA findings and reports\Hollywood\Hollywood Redevelopment Project Area\Property Index (HHI has copy)</p>	<ul style="list-style-type: none"> • This is a non-searchable and non-mappable format. • To find an individual property there are 7 parts no index • Until data is mappable by the public from ZIMAS—as opposed to simply verbally connected to ZIMAS by marking “yes” on Historic Review, and searchable by address, City Planning will put a ZI on all parcels in the Redevelopment Area
<p><u>Density Transfer Procedures</u></p> <p><u>(to incentivize preservation)</u></p> <ul style="list-style-type: none"> • Redevelopment Plan Reqts • Settlement Agreement Reqts: 	<ul style="list-style-type: none"> • <u>Donor and receiver map</u>: from 1993 UDP • <u>CRA</u> to prepare • <u>CRA</u> to figure out how City will implement • City agree no discretionary increase in density in Regional Center Commercial without equal compensatory reduction of development in historic building area

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**Draft Hollywood Community Plan
Update 2018**

**Response to Draft Plan and Draft EIR
Section 4**

Plan Capacity in existing 1988 Community Plan- 330,000 persons

Frances Offenhauser, Heritage Properties
Updated Jan 2019 for review of Nov 2018 Draft

Background:

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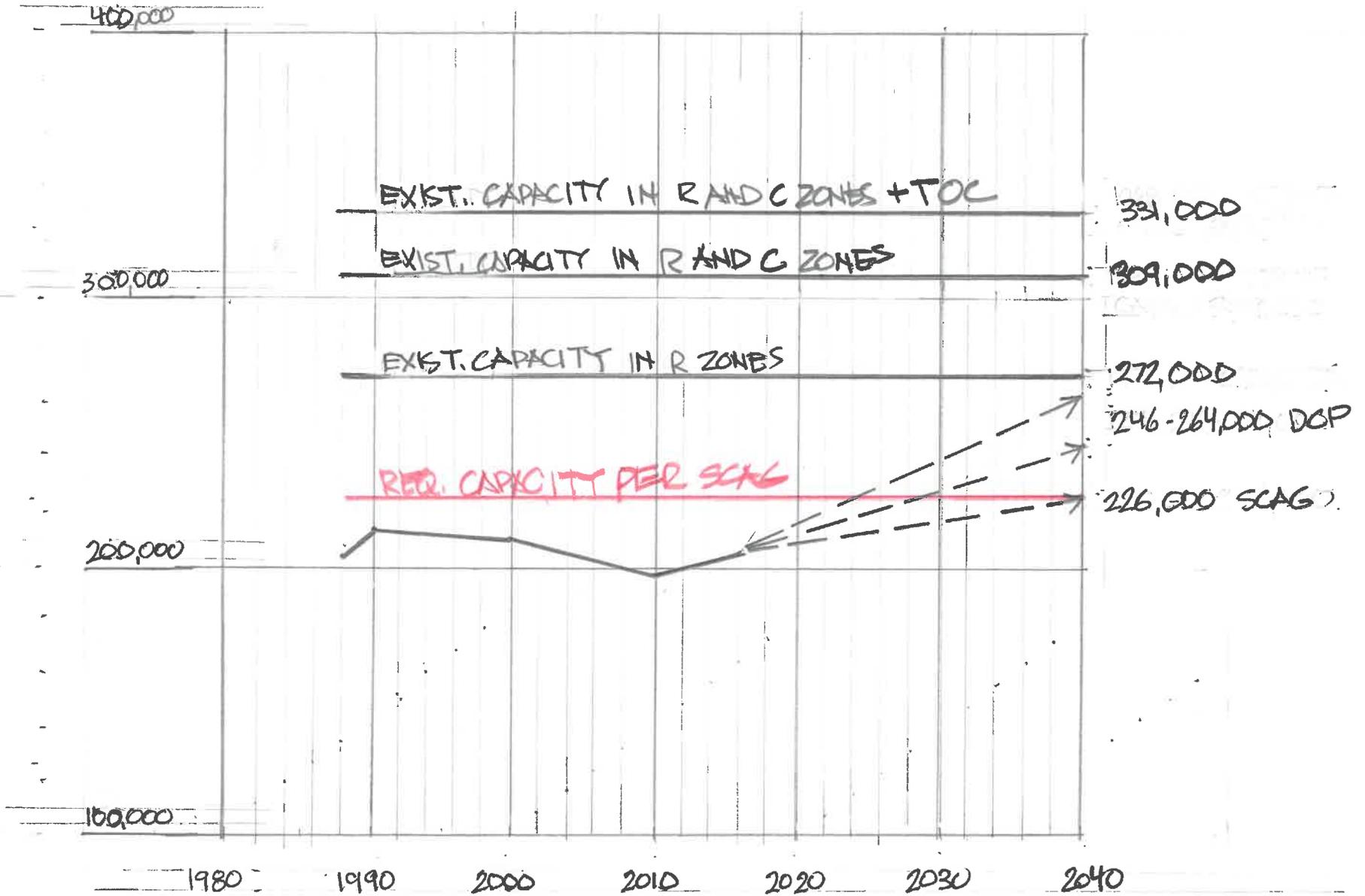
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	especially for designated or eligible historical resources.	and guidance from DCP and LADBS	Unclear actions and timing	
P 1.3	<u>Designated and potentially significant resources.</u> Preserve designated Historic Cultural Resources and further study eligible resources as potentially significant resources.	How? No policies or implementation provided	No implementation process or specific timing	Prior to Plan Adoption— extend CHM protection to all National Register properties (Ken says this is already being done?) list all buildings required in 1990 as HCMs now
P 1.4	<u>Buildings in FAR Incentive Areas.</u> Protect designated historical buildings, including those which are located within Floor Area Ratio (FAR) Incentive Areas and multi-family residential areas where the Plan restores citywide standard R4 density – red is unclear	<ul style="list-style-type: none"> • P32 Establish zoning which conditions a project’s use of Floor Area Incentives upon conformance with Secy Int Stds • P33. Study the feasibility of TDR Hollywood program 	DCP- No implementation process or specific timing	Prior to Plan Adoption— Connect to CRA Redev Plan
P 1.5	<u>Distinctive street features.</u> Protect distinctive features of prominent streets in Hollywood, such as the Walk of Fame, a recognized Historic Cultural Monument of the City of Los Angeles.	<ul style="list-style-type: none"> • P34: Maintain Walk of Fame designation, dimensions • P66: Rehabilitation Plan for Walk of Fame 	DCP/BOE/DOT- Clarify and report existing process and procedures, No process or timing proposed	Add significant streetscapes—Cahuenga, etc, as identified by CRA survey
P 1.6	<u>Study preservation tools.</u> Support the study of Residential Floor Area (RFA) Special Districts, Community Design Overlays (CDOs), or a Community Plan Implementation Overlay (CPIO) for neighborhoods that retain a cohesive character but are not eligible to become Historic Preservation Overlay Zones.	How? No policies or implementation provided		Prior to Plan Adoption— Commit to neighborhood protection—develop excellent tools and include Extend CPIO to residential neighborhoods Connect to CRA Redev Plan
P 1.7	<u>Preserve designated resources.</u> 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	<ul style="list-style-type: none"> • P35: 2017 Use Secretary of Interior Standards for “any development project” • P 35: 2018 Establish regulations “D” limitations to ensure appropriate review of historic resources 	DCP-	Prior to Plan Adoption— Add Preservation Brief #14 Follow up on conflict mapping- evaluate, create new Land Use and zoning controls parcel by parcel or some other way?
P 1.8	<u>Complementary design.</u> Encourage the design of new buildings that respect and complement the character of adjacent historical resources through design standards ..such as CDO, CPIO	<ul style="list-style-type: none"> • P36- Use Citywide Design Guidelines for new and infill development • P37: Study Rodney/Lyman/Alley 	DCP No process or timing proposed	Prior to Plan Adoption— Connect to CRA Redev Plan <i>Hollywood Blvd Urban Design Plans, etc</i> Add Preservation Brief #14

		<p>for potential historic significance</p> <ul style="list-style-type: none"> ● P38: Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character 		
P 1.9	<p><u>Land use and zoning.</u> Maintain appropriate General Plan Land Use designations and zoning in existing historic districts which are either listed in, or are eligible to be listed in the National Register of Historical Resources. Promote infill development that matches the scale of historical resources within each district, including the following: height, massing, setbacks, stepbacks, and development pattern</p>	<ul style="list-style-type: none"> ● P 39: Study Afton Square, Selma Le Baig, Serrano 	<p>DCP- No process or timing proposed</p>	<p>Prior to Plan Adoption— Revise all proposed land use designations due to conflicts Hollywood Core Transition by CRA affects Afton Place Hollywood Boulevard most important National Register District Require use of Preservation Brief #14 Extend HPOZ protections and procedures immediately Prohibit parcel assembly Strong development limitations and override of TOC needed urgently</p>
P 1.10	<p><u>Height limits.</u> Maintain height limitations on commercial zones that border designated or eligible historic neighborhoods. Encourage the design of new buildings that respect and complement the character of adjacent historic neighborhoods.</p>	<ul style="list-style-type: none"> ● P40: Study heights at Sunset and Western 	<p>DCP-</p>	<p>Prior to Plan Adoption—</p>
P 1.11	<p><u>Financial resources.</u> Support efforts to identify financial resources for rehabilitation of historical resources. Promote the use of the City’s Mills Act Historical Property Contract Program, the Federal Historic Rehabilitation Tax Credit, and the California Historical Building Code</p>	<ul style="list-style-type: none"> ● P67: Partner with HCID to rehabilitate housing 	<p>DCP, HCID</p>	<p>Commission economic study</p>
P 1.12	<p><u>Documentation.</u> Support opportunities to document Hollywood’s history and architectural legacy and share that history with the community.</p>	<ul style="list-style-type: none"> ● P41: Support and complete Historic Places LA ● P68: Neighborhood councils and preservation organizations 	<p>DCP-</p>	<p>Ongoing Improve public access through upgrades to ZIMAS etc</p>



H.C.P. CAPACITY & POPULATION PROJECTION
H.C.P. UPDATE 2018

Communication from Public

Name: Carolyn Mohr

Date Submitted: 04/20/2023 11:27 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I have lived in Hollywood all of my life. My children are 5th generation Hollywood residents as their great great grandparents first moved to Hollywood in the early 1900's. The development changes over the past 15 years have had a hugely negative impact on traffic, congestion, and small businesses in Hollywood, as well as the open aesthetic like retaining historic buildings and being able to see the Hollywood sign without tall high rises blocking views. I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Carolyn Mohr
2514 Rinconia Dr. LA, CA 90068

Communication from Public

Name: N. Baker

Date Submitted: 04/20/2023 12:44 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: As a Hollywood resident I feel very strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. We must preserve and protect Hollywood for future generations. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Thank you very much for your time and consideration, N. Baker

Communication from Public

Name: Alonso Duralde
Date Submitted: 04/20/2023 12:50 PM
Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Alonso Duralde
1226 N. Harper Ave. #7 West Hollywood, CA 90046

Communication from Public

Name: Joanna Ramos

Date Submitted: 04/20/2023 01:03 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Joanna Ramos

Communication from Public

Name: Mitchell Bullock
Date Submitted: 04/20/2023 01:10 PM
Council File No: 21-0934
Comments for Public Posting: Please don't raze Hollywood's historic buildings!

Communication from Public

Name:

Date Submitted: 04/20/2023 01:16 PM

Council File No: 21-0934

Comments for Public Posting: Please do not destroy Hollywood Heritage. The City brings in so much business from all over the world to see the great Hollywood. Hollywood is the history of America. Don't destroy a national institution.

Communication from Public

Name: Mary Meyer

Date Submitted: 04/20/2023 01:23 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update needs to be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission that further protection for historic buildings are essential. Not a single historic building or district needs to be lost to meet the housing goal set forth in this Plan. There is plenty of land available outside the historic district that has been deliberately excluded. Pitting housing against preservation is mistakenly at the center of this Plan. Rolling back years of earned historic building protections is completely unnecessary. The built legacy of Hollywood is irreplaceable. We have already lost much of the character of this uniquely Los Angeles neighborhood. Please vote to amend the Plan and its update to protect what is left.

Communication from Public

Name: Fran Offenhauser
Date Submitted: 04/20/2023 01:40 PM
Council File No: 21-0934

Comments for Public Posting: Despite work and effort and multiple rounds of changes, this Hollywood Community Plan sets up a perfect storm for a housing, climate, and transit crisis through its dogged de-regulation of land use to assist private real estate speculation. The "talk" all around it creates an impression that this Plan in its current form is needed, which it isn't. That it will make rents go down and keep tenants in their homes, which it won't. That a nirvana of walkable streets will emerge, which is the opposite- those of us who are here now will be stuck with the bill for un-planning. This chimera is possible because the grinding fundamental work of a Community Plan wasn't done, and its not joyful at all to say that. 1. Fatal planning procedure flaws 2. Nothing new or good for affordable housing 3. Historic landmarks targeted for demolition 4. EIR – real impacts avoided and concealed 5. Public silenced and public benefits removed 6. City's own Housing Element and other figures show HCPU math is wrong I have identified "fixes" . I have lengthy personal experience as a real estate investor and housing developer; an architect and historic architect; an advocate for preservation; and a preparer of the 1988 Hollywood Community Plan and elected member of the Redevelopment Area PAC. I participated in the weeks of public hearings and deliberations for that Plan, and conducted a truly respectful public outreach process which earned me lifelong friends. This rush to Council and data dump of 200 pages at the last minute, and the deceptive language surrounding what is really in this sadly fatally flawed Plan, is a poor reflection on our City. It is not progressive -- it is "business as usual". The reality is so far from the talk, but unless you drill down as I have in the operative parts of the Plan-- the parcel-by-parcel zoning, the Redevelopment protections repeal, the CPIO that doesn't pencil out, the upzoning on Grauman's and the exquisite theaters--and crunched the numbers as deeply as I have, it's invisible. It will play out slowly over the next 8 critical years that scientists say we have. Planning for some reason is asking Council to approve a Plan with avoidable severe adverse effects and grant "by right" projects due to this Plan. If the market responds glowingly, Hollywood will grow roughly 25% with little or no infrastructure improvements. We- the 75% who are here--will foot the bill and bear those consequences.

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To: Councilmembers Raman, Harris-Dawson, Hutt, Lee, Rodriguez, Yaroslavsky
From: Fran Offenhauser
Re: Hollywood Community Plan Update CF 21-0934
Date: 4/17/2023

Dear Councilmembers: Thank you for fielding this memo. Hollywood Heritage prepared a deeply researched critique of the Hollywood Community Plan Update. They will share the details. CD 13 asked for positive suggestions to make a better plan. So I personally shifted my focus, and this memo suggests my expert opinion on how and where the improvements can and should be made. Please note that I personally prepared the 1988 Community Plan with Pat Smith and have developed affordable housing. Contrary to popular lore, the 1988 Plan was more “modern” than this Update, and fully modeled and expected the 2 central Hollywood and the 3 East Hollywood Metro stops, plus a quantified Plan build-out capacity larger than the population goal today. It also fully understood the opportunity in East Hollywood for employment, education, etc that this Update bizarrely misses. Ms Raman- you and I share MIT in common. I was Course 4.

Attached:

1. Recommendations re reversing plan flaws
2. Illustrations

Political Background-

- **3 Council offices in CP boundary**—Soto-Martinez (CD-13- hugely affected); Raman (CD4- virtually no changes proposed) Yaroslavsky (CD 5-very small area).
- **Just Hollywood Coalition**, of which Hugo Soto-Martinez and his union were a part, opposed this Community Plan and agreed with many of our points. Many neighbors heard him promise to not advance this Plan.
- **O’Farrell and other Plan “fixes” should not be-lost due to the CD 13 election:**
 - Don’t repeal CRA protections: O’Farrell’s office warmed to retracting their repeal of Redevelopment Plan protections for historic buildings in this HCPU
 - Don’t create local Director’s authority for National and California Register Districts. City Planning finally understood the CPIO flaw in allowing buildings in these areas to be demolished within the border of these listed Districts . Using the City process for HPOZs was appropriate and equitable.
 - SB 330 does not apply to treatment of historic buildings in Hollywood, because the Secretary of the Interior Standards and other design reviews predated SB 330 by 30 years.
 - “Black and white” objective reviews are a fine goal, but historic and architectural expertise cannot be eliminated . .
- **General agreement the Plan is substandard**, and that the Update gives Hollywood substandard treatment relative to other Plan areas..

Fatal Flaws and Fixes: The Fixes are recommendations for changes to the Plan, effectively amendments. In consultation with a number of leaders, letting this proposed Plan “die” is the best route. But if the optics of that are unacceptable, then it does need major fixes. We have grouped comments as follows;

1. Fatal planning procedure flaws
2. Nothing new or good for affordable housing
3. Historic landmarks targeted for demolition
4. EIR – real impacts avoided and concealed
5. Public silenced and public benefits removed

6. City's own Housing Element and other figures show HCPU math is wrong

Main Point: Does this Community Plan as written today have something in it worth voting for? Sadly NO. It should NOT go forward. If it is to go ahead, it needs surgery. Is this Plan handing out permissions while canceling responsibilities? YES.

Talk is not action: The “talk” parts of this Community Plan—goals, policies, future implementation—get confused with what is the real action. What really goes into effect if this “Plan” is adopted is its “operative parts”:

- **Zoning Changes** (Exhibit D and E)- Matrix of parcel-by parcel zoning Ordinance changes, including wholesale removal of “D” and “Q” conditions imposed in 1988 for environmental compliance. Extraordinary amounts of RSO housing and of historic landmarks are targeted for demolition without any recognition that they are even present on these targeted parcels.
- **CPIO** (Density Bonus zoning) (Exhibit F): A 94 page “tool” trying to prompt private developers to include affordable housing in their projects, while the City’s own economist says it won’t work where it has been located.
- **Redevelopment Plan Repeal Ordinance** (removal of protections for historic buildings transferred to CRA and back to DCP in Nov 2019) (Exhibit D) : Repeals and muzzles citizen involvement; removes required infrastructure improvements; removes mandatory findings and public benefits; repeals desperately needed urban design; repeals desperately needed traffic studies. **This is THE most damaging part of the HCPU.**
- **EIR Mitigations:** These are legally mandatory measures. The EIR is shockingly thin on Mitigations, even retracting measures already in place. Analysis is skipped- EIR just jumps to a conclusion in hopes that saying the Plan has adverse effects will moot any later objections. This is the same EIR error made in 2012 when this Plan had to be rescinded due to Planning Dept procedural errors. You are asked to irresponsibly adopt a Statement of Overriding Consideration while violating 13 EIR sections. The EIR is fatally flawed.

HCPU is old school upzoning-- the uncreative “one trick pony” solely pushing new construction to replace what is here, not sustainably add to and take care of what is here. No modern real world planning tools adaptive re-use, urban design plans. There is literally no map where you can see that answers the question “what is the Plan?”

- The CPIO “magic” just replaces TOCs. It’s a convoluted twisty set of rules that cannot be clearly explained for Council to even vote on.
- To produce affordable housing it doesn’t work financially, according to City Planning’s economist. On average, 5% of new “density bonus” housing is “affordable”. The City purports to be pursuing a 40% goal. Because of the defunding of low income housing by the State and Federal government, zoning is looked for as a panacea, but the single most sensible move in Hollywood is to move the affordable housing CPIO to where it will work—East Hollywood.

Where growth should be channeled is what matters. It is bizarre and lopsided: Growth will happen, subject to market forces or new public funding. Making Hollywood livable, sustainable, and resilient, is what a real Hollywood Community Plan is required to tackle. **That is not what we have.** Forcefeeding growth into central Hollywood is like overloading a ferry, and forgetting that another ferry is right there. All the areas needed for growth were identified by Hollywood Heritage, with many many missed by the Turner Center. Most importantly, the quantity of buildout for the Plan was never calculated—a fatal flaw,.

Causing unnecessary “neighborhood busting”, climate disintegration, GHG increase, community input muzzled, streets, parks, and sidewalks not required from developers, throwing costs on to taxpayers and ratepayers. And

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a Death Star of demolition over America’s Hollywood Boulevard and other historic district treasures, stripping away 35 years of sane historic protections. Really- vote for a Plan to destroy Grauman’s Chinese?.

Housing production is realistically already happening-without upzoning making costs shoot up: Hollywood was exempt from Prop U, and has had high density zoning and masses of housing entitled and built. In this HCPU the City fails to use its own extensive data, which shows that 32,000 +/- housing units “needed” for 2040 are ALREADY built, permitted, or entitled in Hollywood during the Plan process (2016-2021 data).

The current 1988 Community Plan capacity was conservatively calculated at 272,000 persons, MORE than the top number of 264,000 this plan aims for by 2040 Massive new housing capacity and product has been funneled into this Community Plan area without upzoning, due to residential development now in commercial zones; ADUs, large discretionary giveaways under prior Councilman, and State laws such as SB 9 and 10. Community Plan Update upzoning is NOT needed.

High density zoning is already in Hollywood, with massive discretionary actions, and it has NOT brought affordability of helped homelessness.

Plan flaws and positive fixes

		Current HCPU	Fixes
I	Fatal planning procedure flaws	<u>Redevelopment Plan repeal proposed but hidden, mislabeled, and unanalyzed:</u> Removes City current obligations for infrastructure, historic buildings, design reviews. See attached Chart. Called an “amendment”, but is a repeal	<u>Cancel the repeal of Redevelopment Plan protections (Exhibit D- page 340-342):</u> . Cancel repeal of historic protections; repeal of public benefit requirements; repeal of public involvement requirements. These obligations continue to 2028. What is proposed to replace them is wholly inadequate. Take advantage of the “open basket” of Sec 506 Urban Design Plan requirement to greatly improve Community Plan (see below)
b		<u>CPIO creates unacceptable conflict: Feb 2020 Bertoni memo error pitting housing against preservation, rather than finding proper locations for each:</u> CPIO boundary was set up to protect central Hollywood landmarks, and sold in meetings and to the public through Feb 2020 as that. CPIO released in Aug 2020 was a “volteface”; it was added AFTER release of EIR and never analyzed, It mistakenly locates residential density bonus on historic parcels such as Grauman’s Chinese	<u>Revise CPIO map (CPIO Exhibit F) If CPIO has merit.</u> Show that the Hollywood Boulevard Historic District is the full length from El Cerrito to Gower, not cut down to 1/3 its size as shown in CPIO. Expand demolition protections and allow added FAR to be transferred out, but not used on site unless it can coexist with current landmark. <u>Or MOVE CPIO to an appropriate location— East Hollywood for example--</u> Out of historic areas and into lower density sparsely built, non-historic corridors.. (CPIO map- attached below).
c		<u>HR&A Economic Study says CPIO density bonus will NOT work</u> High density areas where proposed the CPIO density bonus does not work. Downtown Plan analysis showing CPIO type bonis are not feasible there.	<u>Revise CPIO map (CPIO Exhibit F) If CPIO has merit, ADD IT to an appropriate location—East Hollywood for example</u> Map attached below
d		<u>Failure to calculate buildout capacity. Fatal error.</u> “Reasonable expected growth” methodology is non-compliant with fundamental OPR and standard practice. <ul style="list-style-type: none"> Failure to quantify current Plan capacity- (aka “Buildout”): Conservative estimate 	<u>Remand FEIR to make compliant (Exhibit G); Revise Plan Text (Exhibit D) :</u> Accurately calculate current “Plan Capacity’ aka “Buildout” compliant with OPR Guidelines. See LA County process for example.

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		<p>in 1988= 272,000 persons. Current data estimate-320,000 – 470,000 persons under existing 1988 Community Plan</p> <ul style="list-style-type: none"> • Failure to calculate increase in buildout capacity since 1988--enormous residential growth possible in commercial zones; ADU's; discretionary actions ; State bills 	
e		<p><u>Failure to address real and modern planning issues:</u> Failure to address real “on the ground” issues areas especially on Hollywood Boulevard: to update and improve Adaptive Re-Use; to monitor City progress re parking deficit and garage construction and operation; to marshal City services and improve façade alterations; to analyse Heart of Hollywood for traffic, loading, and other impacts, to address genuine sustainability; to insure public realm is not downgraded by new construction</p>	<p><u>Enable/require Specific Plan/Urban Design Plan/ cancel repeal of Redevelopment Plan (Exhibit D p/ 340-342) .</u> <u>Do not repeal known planning tool for economic success:</u> . Urban Design Plan is already required, but HCPU proposes to repeal it as part of misguided Redevelopment Plan repeal. “Specific Plan” (aka Urban Design Plan) needed for Hollywood Boulevard NR District to encourage adaptive reuse; pedestrianize and improve the pedestrian experience; support hard hit commercial areas; deal with remaining parking deficits . City Planning prepared a Specific Plan for Hollywood Boulevard in the mid 1970's(!!!) which was deferred for the Redevelopment Plan.</p>
f		<p><u>Removal of D and Q conditions:</u> D and Q conditions were implemented for environmental mitigation to actively integrate redevelopment plan obligations with City Planning obligations. .</p>	<p><u>Correct Matrix (Exhibit E) Retain current D and Q Conditions</u> Regional Center Land Use does not guarantee or dictate use of high density zoning. D and Q Conditions instituted for environmental necessity. Removing them without analysis and without evaluation of specific adverse effects is insupportable.</p>
g		<p><u>Upzones while touting affordable housing and preservation . Fails identify where.</u></p>	<p><u>Condition all changes in the Zone Matrix Exhibit E:</u> Increases should be only attainable with either specified public benefit or specified affordable housing . Identify all historic resources and RSO building parcel by parcel. Turn “talk” into action.</p>
h		<p><u>General Plan Amendment proposed in HCPU to avoid complying with General Plan (Exhibit C)</u> Violates City of Los Angeles “growth neutral” General Plan Framework. Changes General Plan Regional Center boundary”.</p>	<p><u>Withdraw Amendment</u></p>
2	<p><u>Nothing new or good for affordable housing</u></p>	<p><u>Plan causes evictions-</u> Evictions 2016-2021 from RSO units <u>exceeded</u> new bonus density units. No attempt to correct. HCPU Matrix fails to identify RSO parcels in the upzoning. Upzoning directly results in demolition and evictions. No planning done. Housing Element identifies 6,600 parcels with RSO units for upzoning in Hollywood alone – a huge amount.</p> <p>Empty building are a scourge in Hollywood . Ensure apartments keep residents</p>	<p><u>Require RSO mapping in Matrix Exhibit D:</u> Require parcel by parcel data to include whether a parcel has RSO units. Map proposed upzoning on RSO parcels as proposed in HCPU, and in Housing Element .</p> <p><u>Deny demolition of RSO housing-</u> “scorched earth” 5 years</p> <p><u>Delay RSO demolition until building permits Ready to Issue</u></p> <p><u>Add anti-displacement language</u> per Harris Dawson</p>

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b		<u>Where is the required monitoring of affordable housing as required by LAMC 11.5.8?</u>	<u>Add strengthened Ordinance requiring and specifying monitoring</u> of affordable units; ensure they maintain affordability- building permit evidence is insufficient. Specifically require data separated for HCP area
c		<u>1:1 Affordable replacement not recommended</u> HR&A Economic Study says replacing RSO units demolished not feasible?	<u>Re-analyze replacement economics and revise Plan zoning so replacement will work. This is a fundamental issue :</u> Don't accept that affordable housing can't be replaced 1:1. Change the Plan-- -Move incentives to area where replacement does work There are answers- if the new construction in high density areas is too expensive, demolition of RSO housing is wrong. Don't accept the illusion of progress. -promoting Community Plan. Require the mapping and the data
d		<u>Replaces TOC's by removing union labor requirement, local hiring requirement, etc:</u> City Planning is very committed to ending the TOC program, as revealed in their recent rollout of webinars. Its unclear why.	<u>Add the union requirement language from TOCs back in (CPIO Exhibit F text- for all projects.)</u> This is not our knowledge area. Union canceling may not be the goal, but it is the effect of getting rid of TOCs .
e		<u>Density bonus program is financially infeasible in central Hollywood</u> according to City Planning economist HR&A CPIO financially unfeasible where it is located-- inflated land costs, and high cost building type	<u>Revise CPIO map (CPIO Exhibit F) If CPIO has merit, LOCATE CPIO in an appropriate location—East Hollywood for example</u> due to lower land costs, lower construction costs (due to lower stick built construction type)
g		<u>Reduces amenities and infrastructure requirements for luxury housing- moving burden on to taxpayers</u>	<u>Zoning Matrix (Exhibit E)- Condition all zoning increases on provision of affordable housing</u> No more giveaways (Valued from \$20 mil for 1540 Wilcox to \$120mil for Crossroads), landing the burden on the taxpayers, traffic, etc for luxury projects.
3	<u>Historic landmarks targeted for demolition</u>	<u>List of historic buildings and districts in Plan and EIR wrong, incomplete, inconsistent, outdated. Appendix L incomplete, out of date, inconsistent etc.</u>	<u>Remand EIR Sec 4.5 Cultural Resources Remand EIR Appendix L Correct Plan Text Exhibit C, maps 4.9-5f et al:</u> So many errors cannot be cited here. Hollywood Heritage has separately written a white paper on how to correct all the errors.
		<u>Historic building conflicts not made clear</u>	<u>Add column to Zoning Matrix Exhibit D-</u> Add a column flagging parcels in historic districts and/or having historic landmarks. Do conflict mapping. Provide a clear, understandable map of the CPIO
		<u>Repeals longstanding, critical existing historic protections—such as using Secretary of the Interior Standards—and replacing them with verbal “goals “ which have no operative meaning</u>	<u>Cancel the repeal of Redevelopment Plan protections (Exhibit D- page 340-342):</u>
		<u>Locates Hollywood Boulevard National Register District wrong: Despite contacting City Planning repeatedly, their error was not corrected-</u> reducing a national register District listed at	<u>CPIO Exhibit F corrected- both the stated location of the Hollywood Boulevard District, and its treatment</u>

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		the National (highest) level of importance in the country to about 1/3 its actual length	
		<u>Targets most historic part of Hollywood for demolition--</u>	<u>Footnote Matrix Exhibit E Retain D Conditions specifically for sites of National and California Register properties, including all District properties;</u> require Urban Design Plan and Transportation coordination
		<u>Prohibit demolition without investigation within National Register boundary</u>	<u>CPIO (Exhibit F) – Delete Director Authority to override CEQA; require investigation of all non-contributors in Districts</u>
		<u>Prepare District character-defining features</u> to assist Planning Department staff in evaluating <u>proposed entitlements and permits within National and California Register Districts</u>	<u>CPIO (Exhibit F) – Insert District character-defining features prepared by Hollywood Heritage into HCPU</u>
		<u>SurveyLA properties identified as “eligible” in EIR, with zero action, protection</u>	<u>Plan footnote add: Apply to all SurveyLA-identified properties:</u> All permits and entitlements affecting parcels with SurveyLA identified properties shall be referred to OHR
4	<u>EIR – real impacts avoided and concealed</u>	<u>Fatal flaw: EIR defaults to “significant adverse effect” for 13 Plan Elements without ever assessing data:</u> I. 13 elements – of which land use is REQUIRED to be coordinated and consistent with housing AND with traffic, conservation, open space, noise, safety, environmental justice, and air quality II. These are not clarified or quantified III. Jumping to “significant adverse effect” without analyzing what effect the Plan causes and why is fatal flaw	<u>Remand EIR back to City Planning</u>
	b	<u>EIR circulated PRIOR to CPIO-</u> new 94 page complex density bonus system no environmental review of key section of HCPU	<u>Remand EIR back to City Planning-</u> Automatic failure
	c	<u>Outdated- 2016 data-fails</u> I. Failure to calculate actual growth from ADUs, housing built in commercial areas since 1988, housing entitled thru discretionary actions etc growth	<u>Remand EIR back to City Planning</u>
	d	<u>Failure to include current Mitigation Measures now in force-</u> -_Redevelopment Area EIR mitigations cannot be eliminated without notice of specific adverse effect, as these are in force now	<u>Remand EIR back to City Planning</u>
	e	<u>FEIR failure to update from 2016: 7,000 already-built housing units discounted as “vacant” to make effects “go away”.</u> FEIR says no change from 2016 data to present because 7,000 housing unit as are vacant!!!	<u>Remand EIR back to City Planning</u>

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f	<p>Failure to meet fundamental obligation of a Community Plan-- calculate infrastructure and public services: Water supply, power supply, waste removal. Emergency preparedness, stormwater, street lighting, parks and libraries. Failure to calculate</p>	<p><u>Remand EIR back to City Planning</u></p>
g	<p>Population methodology fails : Same errors and more as methodology in 2012</p>	<p><u>Remand EIR back to City Planning</u></p>
h	<p>Failure to quantify housing already entitled, built, or under construction:</p> <ul style="list-style-type: none"> All housing unit growth envisioned by the City Planning (264,000 persons) ALREADY built, permitted, or entitled since 2016 data in the Plan 	<p><u>Remand EIR to make compliant (Exhibit G); Revise Plan Text (Exhibit D) ;</u> Include data from 2016-2022-calculate all housing already in pipeline relative to RHNA goals- RHNA goal already met for Community Plan area under 1988 Plan- HCPU upzoning growth-inducing and unnecessary RHNA- Hollywood Heritage has calculated this.</p>
i	<p>Failure to use data: Housing Element data does not corroborate City Planning HCPU land use plan. Housing Element includes 6X upzoning needed, as revealed on p 191 of the Housing Element. Proportional requirement for Hollywood CP not revealed if intended to vary for current proportion (7%) .</p>	<p><u>Release Housing Element data separated out for Hollywood Community Plan area-- separated from Citywide data: -</u></p> <p>This data dis-aggregation analysis was submitted to City Planning as a part of Housing Element</p>
j	<p>Failure to quantify needed commercial and industrial growth</p>	<p><u>Revise Plan text (Exhibit B).</u> Add quantitative data to show how and whether commercial and industrial upzoning is supportable and consistent with all other Plan Elements</p>
k	<p>Appendix M- fails: Calling 35 year laws “inefficient” not a reason to skip known Mitigation Measures and measures currently in force.</p>	<p><u>Remand EIR back to City Planning</u></p>
l	<p>Appendix L fails: inaccurate data, inconsistent between text and EIR; out of date-</p>	<p><u>Remand EIR back to City Planning</u></p>
m	<p>Public infrastructure and public services not coordinated with growth-moves burdens over to taxpayers: Water supply, power supply, waste removal. Emergency preparedness, stormwater, street lighting, parks amd libraries</p>	<p><u>Remand EIR back to City Planning</u></p> <p>Calculate, monitor, mitigate: Water supply, power supply, waste removal. Emergency preparedness, stormwater, street lighting, parks amd libraries</p>
5	<p>Public silenced and public benefits removed</p> <p>CPIO cuts out public reviews--- leaves decisions up to City Planning—current neighbors cut out of decision-making</p>	<p><u>CPIO (Exhibit F)- Delete sections granting authority to Director and add sections requiring public review.</u> Hollywood Heritage has a separate analysis of these</p>
b	<p>Lowered quality of everything- remove requirements for parks, sidewalks, parking</p>	<p><u>Require detailed annual inventory of public infrastructure..</u></p>
c	<p>Removal of traffic improvements responsibility for developers to provide traffic amelioration to offset effects of project’s construction</p>	<p><u>Enforce Sec 506 and 518 of Redevelopment Plan-</u> development to take care of gridlock contribution prior to construction Complete traffic analysis as required for Regional Center FAR</p>

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		Complete LOS analysis in addition to VMT- Hollywood has through traffic- putting on blinders to it is unhelpful
--	--	---

Hollywood Blvd – should Grauman’s be replaced with 84 units as shown in the Housing Element and enabled in the HCPU/CPIO?

Lets not lose what makes Hollywood Hollywood



Community Plan promotes demolition of historic buildings hiding under bad remodeling

Key #1 – Identify and Protect Historic Districts

IMPORTANT!!!

Hollywood Boulevard has many hidden gems



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3 out of 4 of these are new buildings- design review

New buildings can fit in. Why can't we have better?



Table 2-1
Population, Housing and Employment

	Existing (2016 Estimate) ^{1, 2}	2040 Projection ¹	Plan's Reasonable Expected Development ²
Population (persons)	206,000	226,000	243,000 - 264,000
Housing	104,000	113,000	121,000 - 139,000
Employment (jobs)	101,000	119,000	124,000 - 130,000

¹ Based on SCAG estimates (2016-2040 SCAG RTP/SCS).

² City of Los Angeles Department of City Planning
Numbers are rounded to the nearest thousand.

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Other cities with historic main streets have succeeded—Pasadena, Santa Monica, Riverside, Culver City, Redlands, Santa Barbara, Sausalito...even Beverly Hills and Larchmont did it.

WHY NOT HOLLYWOOD ???? Thank you for asking this question with us.



Right now these priceless landmarks have a genuine demolition bullseye on them!



alamy stock photo



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No upzoning needed-- residential units supposedly "needed" in HCPU area for 2040 have been constructed, permitted, or entitled since DEIR preparation in 2016, based on data

RHNA TARGETS – CITYWIDE

	2013-2021 City Target Units	2013-2021 OR 2009-2020 Actual Units	2021-2029 City Target Units
Very Low Income and Low Income	32,861	12,300* OR 15,886	184,451
Moderate and Market	49,140		271,922
TOTAL	82,002	117,088	456,643

* "Affordable"- Housing Element page 13; PLUM Committee report Page 22 15,886 2009-2020; May 2021 PLUM report CR 19-0416 Citywide 25% of "affordable" housing fully subsidized

TARGETS IN HOUSING ELEMENT- CITYWIDE

	Appendix 4.1 "Adequate Sites" Units (includes 44,832 expected; 144,070 pipeline; 45,340 ADU; 21914 on public lands; 10,491 Warner Center)	2021-2029 City Target Units
TOTAL	266,647	486,379

RHNA TARGETS APPLIED TO HOLLYWOOD CPU

	2013-2021 Hollywood Target*	2009-2020 Hollywood Actual	2021-2029 City Target Units
Very Low Income and Low Income	2,237	1,392**	12,786
Moderate and Mkt	3,444		19,153
TOTAL	5,740		31,965

* Citywide x Hollywood proportion of whole at 7%

** PLUM Comm Report Page 21 "Affordable Housing units produced by Community Plan area. 62% fully subsidized. According to Heritage Properties submitted as evidence for Housing Element,

HOLLYWOOD COMMUNITY PLAN (Ch 2 "Community Background" August 2021

Table 2-1 "Population, Housing, and Employment" published excerpt

	Existing (2016 estimate)	2040 Required SCAG Projection	Plan's "Expected" Dev't
Housing Units	104,000	113,000	121,000-129,000
Increase from previous		9,000	17,000-25,000

Note 1: Based on SCAG estimate (2016-2040)

Note 2: City of Los Angeles Department of City Planning

HOUSING ELEMENT – Data for HOLLYWOOD COMM PLAN AREA

	(2016 estimate)	2016- 2021-	Entitled (Apdx 4.3)	2029 Sites (Apdx 4.1)	2029 Upzoning Apdx 4.7	TOTAL
Housing increase	104,000	*9,595	**4,537 **14,355	***6,279	****75,274	*****110,040

* This is an undercount- HCPU- 7,000 vacant units + Housing Element Appendix 4.3 2,595 permits issued and in process

**Housing Element Appendix 4.3 Entitled and Entitlement Applications 9,184 + 5,171 = 14,355 plus projects with demolitions and other entitlements not shown in Apdx 4.3 at minimum 4,537

*** Housing Element Appendix 4.1 Adequate Sites- sites found through Turner Center algorithm to be probable developments by 2029.*** *- This is a huge undercount, and ADUs etc were counted elsewhere

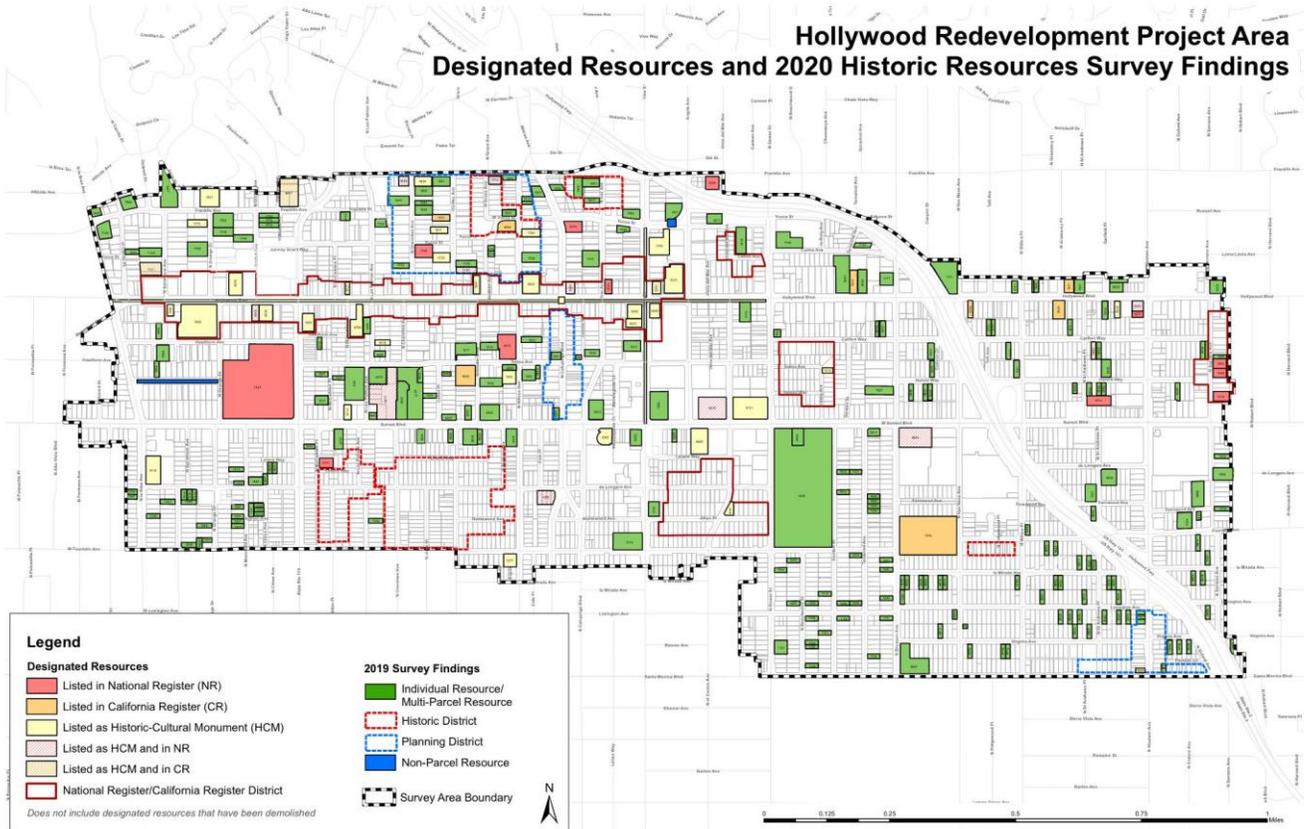
**** Housing Element Appendix 4.1—current Hollywood units in the 4.1 table FYI 36,508

*****Housing Element Appendix 4.7 – recommended upzoning

Conclusion- No upzoning needed. Conflict created by upzoning historic properties can be avoided. 34,7866 units already built or entitled for RHNA and Community Plan

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The upzoned areas have the greatest concentration of historic building in Los Angeles outside of Downtown- I think the greatest number of restored historic theaters in the nation—this accurate map, however, is NOT in the EIR!



City Planning has been reducing housing and hotel “giveaway” entitlements, and now TOCs and density bonus are increasing. But math of density bonus cannot provide 40% affordable housing in significant amounts without subsidy.

including an in-depth accounting of affordability levels, geographic locations, and more. Each graph in the Housing Progress Dashboard is fully interactive—click on a bar, line, pie, or map area to change the information presented in the graphs on that page. For example, in the chart “Percentage of Units Proposed by Entitlement Type,” clicking on the 2016 bar will update the surrounding figures to show data for 2016 only.

Below, explore the dashboard and the progress City Planning has made toward meeting the housing needs of our communities.



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O:\OMA-data\Personal\Frances Offenhauser\HHI\C- City Planning, CRA, Protections, StandRDS\Community Plan. General Plan\HPCU 2021\RamanAlternativeHCPU 2023 and summary flaws.docx

Communication from Public

Name: Luis Rodriguez

Date Submitted: 04/20/2023 02:39 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Luis Rodriguez

Communication from Public

Name: Don Roszkowski

Date Submitted: 04/20/2023 09:13 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I frequently fly into Los Angeles to visit friends and relatives for many years. Hollywood industry has made Los Angeles for what it is today and would be a travesty if it is erased. I've travel to parts of the world like London Uk, and they have preserved most of their historical buildings that date back at least 500 years ago. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Don Roszkowski

Communication from Public

Name: Katherine

Date Submitted: 04/20/2023 09:16 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Katherine

Communication from Public

Name: Joseph Guidera
Date Submitted: 04/20/2023 09:17 AM
Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. As a homeowner & resident of Hancock Park, I feel not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Joseph Guidera

Communication from Public

Name:

Date Submitted: 04/20/2023 11:54 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. As an L.A. resident who lives and works in this area, and spends much of my recreational time enjoying and appreciating the history ---and historic sites and character of Hollywood---please consider all of this and vote to change the Plan in accordance with the alterations listed above!
Sincerely, David Tiktin

Communication from Public

Name:

Date Submitted: 04/20/2023 02:49 PM

Council File No: 21-0934

Comments for Public Posting: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Hollywoodland Resident

Communication from Public

Name: Joanna Linkchorst
Date Submitted: 04/20/2023 04:59 PM
Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. History shows that revitalized historic centers bring people back! They are more interesting, even if contemporary elements are added. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Joanna Linkchorst

Communication from Public

Name: Ruth A. Poons-Geoghan

Date Submitted: 04/20/2023 04:59 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: At the Feb. and March 2021 Planning Commission hearings for the Hollywood Community Plan, there were concerns among commissioners that uber upzoning “beyond planning staff recommendations” in The Regional Center would prohibit desperately needed affordable housing to be built. A vote was held off until March to wait for a requested Feasibility Study, and that study came back at the March hearing and confirmed their concerns, that upzoning will prohibit affordable being built, since upzoning increases land value, and yet some commissioners still irresponsibly voted to support that upzoning.. even as they admitted the #1 issue from all written and spoken public comment was desperately needed affordable housing in The Regional Center and too much is being destroyed for hotels and luxury projects. That vote was NOT unanimous. Some commissioners adamantly opposed that upzoning. That upzoning also threatens Hollywood Historic Resources in The Regional Center/National Historically Designated part of Hollywood. I am submitting in opposition to “upzoning beyond planning staff recommendations” in The Regional Center and in support of protecting potential affordable housing to be built there, in light of having the worst humanitarian homeless crisis in the country, and I support protecting Hollywood Historic Resources, and submit our hard working, caring, dedicated preservation organization’s letter regarding protecting Hollywood History below: I feel very strongly that the Hollywood Community Plan Update recommended by City Planning must have revisions. I support Hollywood Heritage, the Los Angeles Conservancy, and the City’s own Cultural Heritage Commission. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to “goals” or “future implementation”. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of this Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the “redevelopment repeal” Ordinance is buried in this Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable with historic resources

supported by our City, with adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this uniquely Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it.. Thank you.

Communication from Public

Name: Terry Carter

Date Submitted: 04/20/2023 05:07 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Terry Carter
Winona Blvd

Communication from Public

Name: Lauren Lexton

Date Submitted: 04/20/2023 05:32 PM

Council File No: 21-0934

Comments for Public Posting: Dear PLUM Committee Members, I support the Hollywood Central Park, a deck park over the 101 within the Hollywood Community Plan area. The Hollywood Central Park will create much needed open space, addresses environmental and social justice, and curbs 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. Thank you! Lauren Lexton

Communication from Public

Name: Cinzia Zanetti

Date Submitted: 04/20/2023 05:48 PM

Council File No: 21-0934

Comments for Public Posting: I would like to urge the PLUM committee to revise the Hollywood Community Plan and consider suggestions proposed by Hollywood Heritage. It is essential that we preserve the history and character of Hollywood and not destroy what gives the city it's appeal to tourists and film buffs. Preservation is the foundation for a world class city.

Communication from Public

Name: Scott Tracy Griffin

Date Submitted: 04/20/2023 05:50 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Sincerely, Scott Tracy Griffin, Author and Film Historian "Tarzan on Film" (Titan Books, 2016) "Tarzan: the Centennial Celebration" (Titan Books, 2012)

Communication from Public

Name:

Date Submitted: 04/20/2023 07:10 PM

Council File No: 21-0934

Comments for Public Posting: Please redact my email address. Dear PLUM Committee:
Enclosed.

Hillsborough) also were among the largest gaining in 2022, collectively adding 92,848 residents.

Largest Declining

Los Angeles County, California, had the largest population decline in 2022, decreasing by 90,704, continuing a downward trend as the state lost roughly twice that amount (180,394) in 2021. Population declines lessened for some other urban counties that had seen considerable net domestic outmigration and population decline in 2021. New York County, New York, which had a population decline of 98,505 in 2021 due largely to net domestic outmigration, had population growth of 17,472 this past year. Collectively, this year's 10 counties with the largest population declines lost 378,177 people, down significantly when compared to last year's collective drop of 709,775 for that year's 10 counties with the largest population declines.

SOURCE:

<https://www.census.gov/newsroom/press-releases/2023/population-estimates-counties.html>

Table 4: Top 10 Counties in Numeric Decline (Annual)

Top 10 Counties in Numeric Decline, 2021 to 2022

Rank	State	County	April 1, 2020 (Estimates Base)	July 1, 2021	July 1, 2022	Numeric Decline
1	California	Los Angeles County	10,014,042	9,811,842	9,721,138	-90,704
2	Illinois	Cook County	5,275,522	5,177,606	5,109,292	-68,314
3	New York	Queens County	2,405,464	2,328,141	2,278,029	-50,112
4	New York	Kings County	2,736,075	2,637,486	2,590,516	-46,970
5	New York	Bronx County	1,472,656	1,421,089	1,379,946	-41,143
6	Pennsylvania	Philadelphia County	1,603,799	1,589,480	1,567,258	-22,222
7	Michigan	Wayne County	1,793,549	1,773,073	1,757,043	-16,030

SOURCE:

<https://www.census.gov/newsroom/press-releases/2023/population-estimates-counties.html>

Communication from Public

Name:

Date Submitted:

04/20/2023 07:41 PM

Council File No:

21-0934

Comments for Public Posting: To the PLUM Committee: Please find the enclosed 14-page document for your review and for inclusion in the administrative record. Thank you.

April 20, 2023

Dear Members of the PLUM Committee:

Please read our letters.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you.

J.G.

WORK CITED

- Hebert, Ray (1962). City Acts to Save Historic Monuments: Council Creates 5-Member Board on Cultural Heritage. *Los Angeles Times (1923-Current File); Jan 16, 1962; ProQuest Historical Newspapers: pg. B2*
- KAPLAN, SAM HALL (1982). Preservation Takes Root in L.A.: Architectural Heritage Recognized at Last PRESERVATION. *Los Angeles Times (1923-Current File); Jan 25, 1982; ProQuest Historical Newspapers*
- KAPLAN, SAM HALL (1982). Searching for L.A.'s Preservable Past: L.A. PAST: Looking Block by Block. *Los Angeles Times (1923-Current File); Mar 17, 1982; ProQuest Historical Newspapers: pg. OC_D2*
- LAT (Los Angeles Times) (1963). PRESERVATION OF HISTORIC STRUCTURES BACKED BY LAW. *Los Angeles Times (1923-Current File); Mar 10, 1963; ProQuest Historical Newspapers: pg. GB6*
- LAT (Los Angeles Times) (1975). CULTURAL HERITAGE LAW TO BE TOPIC OF HEARING. *Los Angeles Times pg. (1923-Current File); May 25, 1975; ProQuest Historical Newspapers: SG2*
- Rinard, Peggy (1980). Heritage Board Guards Legacy: HERITAGE BOARD. *ProQuest Historical Newspapers: Los Angeles Times pg. J16*
- Swenson, J.J., Franklin, J. The effects of future urban development on habitat fragmentation in the Santa Monica Mountains. *Landscape Ecology* 15, 713–730 (2000). <https://doi.org/10.1023/A:1008153522122>
- USCB (United States Census Bureau) (2023). Growth in the Nation's Largest Counties Rebounds in 2022. Counties with large colleges and universities experience population gains once again. *Census.gov*

City Acts to Save Historic Monuments

Council Creates 5-Member Board on Cultural Heritage

BY RAY HEBERT

Times Urban Plans Editor

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

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

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

Destruction Cited

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

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

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

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

Protect Landmarks

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

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

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

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

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

ATTACHMENT 1

PRESERVATION OF HISTORIC STRUCTURES BACKED BY LAW

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

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

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

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

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

Tujunga Structure

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

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

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

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

Citizens Committee

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

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

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

series of hurdles set up by the Cultural Heritage Board.

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

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

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

Time Factor

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

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

* . . . Any site (including significant trees or other

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

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

Other Board Members

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

ATTACHMENT 2

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See full page image or
microfilm.

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

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

Photo for The Times by Ann Summa

FORMED IN '62

Heritage Board Guards Legacy

By PEGGY RINARD

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

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

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

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

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

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

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

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

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

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

Please Turn to Page 21, Col. 1

ATTACHMENT 3

HERITAGE BOARD

Continued from 16th Page

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

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

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

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

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

"Not so," Welch says emphatically.

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

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

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

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

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

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

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

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

Block by Block

Searching for L.A.'s Preservable Past

By SAM HALL KAPLAN, *Times Urban Affairs Critic*

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

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

Cadre of Volunteers

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

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

The survey also will provide the

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

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

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

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

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

Please see L.A. PAST, Page 11

ATTACHMENT 4

L.A. PAST: Looking Block by Block

Continued from 2nd Page

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

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

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

among others.

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

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

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

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

by state and federal grants.

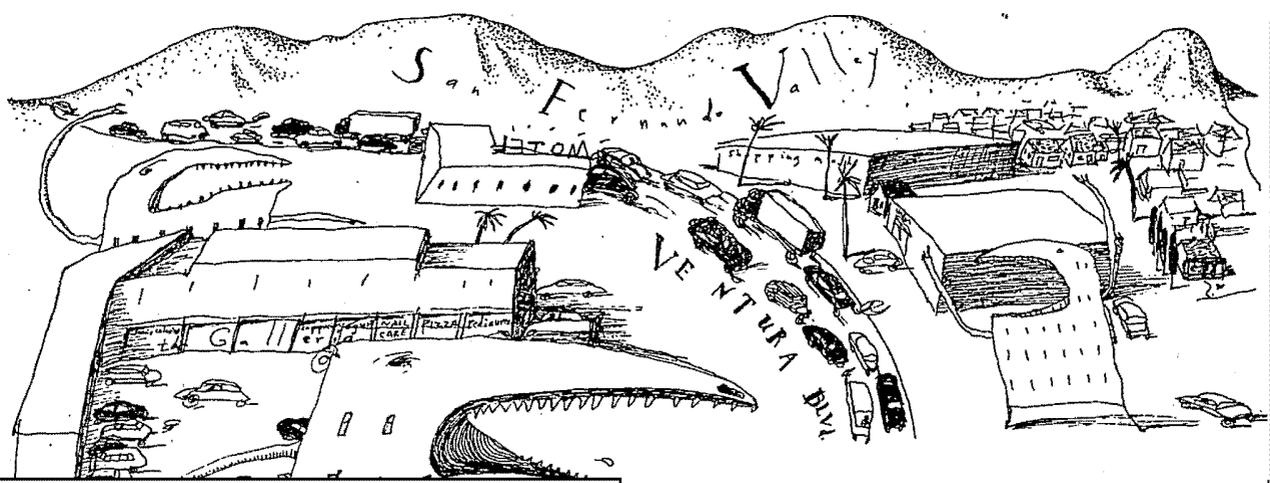
The first 100 recommendations by the volunteer effort are now wending their way out of the review committee in the engineering bureau on City Hall's 8th floor to the heritage board on the 15th floor.

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

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

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

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THE DARK SIDE OF DEVELOPMENT

Without real planning, L.A. borders on chaos

By Mike Davis

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

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

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

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

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

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

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

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

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

BLAIR THORNLEY / for The Times

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Planning

Continued from M1

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

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

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

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

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

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

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

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

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

PLEASE SEE:

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

PLEASE SEE THESE ARTICLES:

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

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

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

REFERENCES:

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

Communication from Public

Name: Toni Gurbel Tinkelman

Date Submitted: 04/20/2023 08:48 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. And I support these alterations more than somewhat!!!! Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. Please, I repeat, the built legacy of Hollywood is irreplaceable. I am from New York. We still regret losing Penn Station. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. There is no doubt this is true! We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. Please, please, please!!! Sincerely, Ms. Toni Tinkelman Hollywood, CA

Communication from Public

Name: Angie Schneider

Date Submitted: 04/20/2023 09:12 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the PLUM Committee: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes missed by City Planning should be made. Back the recognition of our world-renowned treasures with real action now, not sidelined to "goals" or "future implementation." The most famous part of Los Angeles, and the place with the landmarks of the highest level of national importance, should not be getting treatment substandard to our local landmarks. That is what is in the Plan now. Not a single historic building or district needs to be lost to meet the housing goals set forth in this Plan. Pitting housing against preservation is mistakenly at the center of the Plan, and is the critical but correctable mistake of the CPIO. Rolling back years of earned historic building protections in the "redevelopment repeal" Ordinance is buried in the Plan, and is completely unnecessary. The built legacy of Hollywood is irreplaceable and can be profitable if historic resources are supported by our City through adaptive reuse and clever urban design. CPIO affordable housing density bonus incentives should be in effect where there are NOT historic buildings. The City's economic study says they can work-in the lower density areas east of central Hollywood. We have already lost much of the character of this unique Los Angeles neighborhood. Please vote to change the Plan in accordance with Hollywood Heritage, the Los Angeles Conservancy, and the Cultural Heritage Commission to sensibly promote what is left, not bulldoze it. On a personal note, I have moved to Los Angeles from the midwest quite a few years ago. I no longer feel proud of taking friends and family on a tour of the areas around Hollywood. A place that once had so much history and glamour. You can see box and modern buildings anywhere in the US but what is the draw for tourism and to be proud of the history of Hollywood. Sincerely, Angie Schneider 22111 Avenue San Luis Woodland Hills, CA. 91364

Communication from Public

Name:

Date Submitted: 04/20/2023 10:38 PM

Council File No: 21-0934

Comments for Public Posting: Submitted on behalf of Hollywood Heritage. Prior submission of this file was not acknowledged by receipt of a verification email from this system.



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

Ms. Linda Lou
December 16, 2020

Re: HOLLYWOOD COMMUNITY PLAN UPDATE CPIO

Dear Ms Lou:

Hollywood Heritage is in the process of reviewing both the Hollywood Community Plan Update and the proposed CPIO (Community Plan Implementation Ordinance). This letter principally addresses the Community Plan Implementation Ordinance (CPIO) issued to the public August 2020.

Hollywood's identity is firmly based in its history and historic buildings. Those buildings are our brand, our nationally recognized important cultural monuments, and our foundation for a livable and sustainable City. This Community Plan made a commitment to their preservation. We know what they are, where they are, and what is significant about them. So integrating the known qualities of these landmarks can without question now be the backbone of planning for Hollywood.

Hollywood Heritage reserves the right to re-submit these comments. While the comments are addressing the CPIO, the new versions of the Plan Text and Matrix issued in August 2020 have triggered the need for re-doing all the background analysis of the zoning in the Community Plan Update which led to our EIR comments. As the EIR corrections have not been issued, these changes cause a moving target for substantive comment.

BACKGROUND

DEIR shows proposed Plan has significant and unavoidable adverse effects: The Draft EIR for the proposed Hollywood Community Plan reported the City's belief that their Plan released in 2018 will significantly adversely affect historic resources. HHI knows this is unacceptable-- but at the moment agrees that this is probably accurate. It is preventable—there is no overriding consideration that is not resolvable.,

Although the 2018-2020 Plan and DEIR offered no underlying analysis and no map to reveal the problems created by the Plan, when this same Plan was issued in the run-up to 2012, City Planning did release maps

--illustrating the across-the-board upzoning. Our sampling and mapping found upzoning in most of the Plan, and especially in historic districts, directly threatening well over 50% of landmarks.

Of all the Hollywood Community Plan documents, what ultimately gets adopted and acted upon is the “Land Use Plan” and “Matrix” (proposed zoning). These are the real Plan-- adopted by the City Council as multiple new zoning ordinances. The upzoning proposed and the “overzoning” already in the 1988 Plan is a tsunami for historic Hollywood. It causes existing historic buildings to be demolished; land to be more expensive; neighborhoods and districts to lose cohesiveness, historic character, and livability; and pressures to compensate for higher land values through building height and density—meaning doubling and tripling construction costs that make housing un-affordable. The Community Plan to date is a Blueprint for Loss, offering upzoning unsupported by credible analysis, and offering no substantive tools—or even including current tools—to mitigate this giant loss.

If the unstated intent of the CPIO is to somehow supplant the obligations the City has assumed in the transfer from the Community Redevelopment Agency-- the CPIO as drafted does not do that.

IS THE CPIO THE ONE SUFFICIENT PRESERVATION TOOL? This CPIO is the first and only provision we see as part of this Community Plan that integrates historic buildings into the Plan or Planning—otherwise historic preservation features high in “goals” and “policies”, but with the actual planning it is sadly in stark conflict.

The CPIO has 3 goals—one is to “Preserve Historic Resources.” The CPIO is the single zoning action in the HPCU to implement a commitment to historic preservation and to enable a conclusion of “no significant adverse effect” of the proposed Plan. Thus all must evaluate the CPIO rigorously. To date it appears that the CPIO does not effectively change the dire environmental effect.

In Attachment #1 Hollywood Heritage includes a listing of what documents we have found and reviewed pertinent to the Hollywood CPIO, and what comments HHI has submitted over time regarding historic buildings and the Hollywood Community Plan.

DOES THE CPIO DELIVER?

- I. Is the CPIO the mitigation for historic buildings which will reverse the proposed 2020 Land Use Plan’s significant adverse effects? **No.**
 - **CPIO fails to apply to whole Redevelopment Area:** The CPIO was initially proposed to apply to the overall Redevelopment Area, and was shown on every parcel at the time of the EIR being issued. It was expected to embody ALL aspects of the Redevelopment Plan which relate to historic structures- alterations, additions, new construction, demolitions.. But currently (see Map #1) the CPIO applies to just a portion of the Redevelopment Area, which itself was a central portion of the overall Community Plan Area. This means that historic resources in the Redevelopment boundary but beyond the CPIO are left with unclarified status, inadequate public notification, and no protection.
 - **CPIO applies to “projects” with “permits”- should be explicit that it applies also to entitlements and EIRs:** The CPIO defines “Project” as “Any activity that requires the issuance of a building, grading, demolition, or change of use permit, unless the activity consists solely of interior rehabilitation/repair work.” To make this clear, it will be better when the CPIO clearly governs for any entitlement discretionary actions, EIRs, etc

- **CPIO is not an “implementation” overlay; it is a mix of re-zoning (upzoning) with relaxing review and protections on historic buildings:** The Community Plan involves new upzoning in an estimated 69 subareas, on top of the “over zoning” conflicts carried over from 1988. The CPIO “tools” then add more upzoning in the form of “incentives” for affordable housing. Upzoning and density incentives are conflict-filled tools in mature urban areas. They promote abandonment, lack of maintenance, and speculation, delivering disinvestment to neighborhoods. These should not be applied in historic areas. The Community Plan Update zoning is almost exclusively growth-inducing demolition-promoting upzoning. To date the calculations justifying any of this have not been made public, not the impact of piling incentives on to upzoning.
- **CPIO is vague, lacking rigor, conflicting, and misleading:** The CPIO purports to be an implementation plan for preservation, but fails to utilize or mention the current laws, standards, OHR procedures and Ordinances, surveys, and extensive scholarly data that must underpin this Overlay. For example, the National Register Historic District—listed at the national level of significance by the Federal government, is mapped wrong—at roughly 1/3-1/4 its actual size. The District qualifies as a “designated” historic resource, but on Page 29 and 30 design standards for it fail to mention the existing Federal applicable Standards (and Preservation Brief #14) that are the standard of review, being applied and reviewed by OHR. This District is omitted from the Preservation Chapter of the Community Plan. The necessity of a Hollywood Boulevard Urban Design Plan—a Plan for land use, transportation, alterations review, etc in the historic district and the areas surrounding it, is omitted. After the CRA has spent \$1 mil or more studying this area and its urban design needs—it goes unmentioned.
- **No specific historic preservation in Community Plan Update outside of CPIO:** The Community Plan is effectively silent on any planning for preservation or historic preservation treatment for the buildings/districts identified by SurveyLA outside of CPIO and CRA boundaries. Desirable activities in the Community Plan Implementation chapter (Ch 7) of the Plan Text are not a part of the Community Plan Ordinances.

2. Does the CPIO carefully carry over all the protections in place for the last 30+ years? Is it sufficient to replace Redevelopment Plan protections? **No**

- **CPIO makes efforts for historic design review, demolition review, TDRs, and protection for “Character Residential Areas” (Hollywood Core Transition District/National Register and SurveyLA historic districts)** The CPIO offers some well-considered protocols for reviewing projects affecting historic buildings, and referring to the Office of Historic Resources for expert review. As noted below, this is not new--these processes are already in place for “designated” resources. The new “Development Standards” attempt to encapsulate character-defining features—Hollywood Heritage will provide a page by page mark up of these.
- **CPIO creates “second class” historic resources:** Prior to this Community Plan Update, the City’s historic building protections have been conducted by the Office of Historic Resources, covering alteration permits for approximately 281 of the landmarks in the Community Plan area (63 inside the Redevelopment Area). The CPIO calls these “designated resources”. The CPIO continues the same procedures and reviews and delay of demolition, BUT 3 “downgrades” are entwined in the CPIO.
 - I. **SurveyLA properties:** Properties identified by SurveyLA as historic are treated differently from the designated landmarks—as “eligible” rather than “designated” resources, thus with lower protections and no OHR formal process.. This may

be in response to lawsuits, so every effort should be made to clarify why this is proposed and to have the Survey accepted

2. 511 List properties: More importantly, over 3 decades of solid work in 4 surveys and the Redevelopment Plan EIR have identified over 1,000 potentially significant properties for the 511 list of the Community Redevelopment Agency, pursuant to extensive preservation responsibilities transferred from the City of Los Angeles to CRA in 1988. These have been vetted multiple times, as times and knowledge changes. Most recently CRA transferred the “ARG Survey” to the City, and Hollywood Heritage has developed the “511 list.” Classed by the CPIO as “eligible” resources, this is a “downgrade” from the status and protections under the Redevelopment Plan, and currently all “5’s” are omitted.
 3. National Register individually listed and District properties should be protected (see below) under the “delay of demolition” procedures built into the Redevelopment Plan. CPIO omits this.
- **CPIO wrongly downgrades to “third class” important buildings in historic districts**: The CPIO on Pages 5 and 6 downgrades Historic District buildings named “non-contributors”. We argue that these must be identified in the Community Plan and trigger review in the CPIO. These buildings do in fact contribute to the overall District in style, massing, urban design etc.-- so much so that they were included within the District boundaries. (Perhaps due to alterations they were at the time not counted as contributors, but this may not be the case now, and an “automatic” removal potentially damages a district.)
 - **Removing and replacing altered contributors and non-contributors does effect an historic district**, because District boundaries were vetted and specifically established due to cohesion, context, and period of significance. A detailed analysis of this is given in Attachment # 4. State case law has clarified the importance and the necessity of environmental review for new buildings in historic districts; Federal procedures guide their evaluation and treatment. Hollywood should not be shortchanged to have less consideration than “non-contributors” and “altered contributors” in HPOZ’s. The CPIO does try to resolve this with design standards applied regardless of location, but that isn’t precise enough for historic districts,
 - **CPIO fails to identify, map, and protect commercial historic district buildings, especially Hollywood Boulevard, and industrial buildings**. The CPIO purports to support districts like Hollywood Boulevard with “contextual incentives” and “design requirements” (Page 4). It purports to add no new height incentives to the National Register District along Hollywood Boulevard, but erroneously depicts the National Register District as subarea RC3, a part of the whole. This must be seen against a backdrop of upzoning and areas already with unlimited or very high heights— incentivization to demolish and replace with new buildings. Critical identification and protection of historic buildings in commercial and industrial zones is missing.
 - **CPIO misses protections for the Franklin Avenue Design District**: Historic areas and landmarks between Franklin Avenue and Hollywood Boulevard are treated as incentive areas for demolition, without recognition of the needs for preservation and special design quality.
 - **CPIO fails to mention or carry over protections of historic resources from Redevelopment Area and prior Community Plan**: Hollywood Heritage expected that carryover of CRA historic protections would be throughout the Redevelopment Area. Appendix #2 shows those protections. These must of course carry into the 2020 Plan—but the CPIO omits them. One prominent example—the Redevelopment Plan extends the 180 day/360day delay of demolition afforded to Los Angeles Historic Cultural

Monuments to buildings on the 511 List (status codes 1-4 at one time). The current Community Plan (1988) has a consistent rationale for historic buildings which integrated CRA's obligations--including Transfer of Development Rights, Hollywood Boulevard Urban Design Plan, etc—with City Planning.

- **CPIO cannot can “clear” environmental review in advance**—Chapter 1 Page 5 and 6 states that demolitions of “non-contributors” in historic districts AND the new construction if compatible with contributing buildings and meeting the Secretary of the Interior Standards “is not an impact to a historical resource.”. This “preapproval” violates CEQA—these non-contributors have not been reevaluated in 30 years; re-assessment cannot be cut off. And District compatibility must require review by OHR. See Attachment #4.

Is there a more robust and effective approach? Yes

- **Better land use/zoning tools are possible besides upzoning and incentivizing demolition:** Planning for a built-out historic area recognizes the existence and size and scale of existing historic buildings, and uses up-to-date tools to densify—if that it the goal, True protections include some which are already in practice (in lieu parking for changes of use rather than new parking) and some are in the CPIO (such as in the Character Residential Areas and in TDRs). But many are not--acceptance of non-conforming uses and density for re-use of historic buildings; promoting conversion of commercial buildings to residential (such as the Adaptive Reuse Ordinance); increasing density and incentives ONLY within existing building envelopes and compatible additions; converting lower density buildings to multifamily units or hotels; or adding appropriate wings or “back houses”. These and other tools allow new housing units with no loss of the historic building, its sustainability, and the urban fabric.
- **Do not purposefully pit preservation against affordable housing:** Incentives for higher density which trigger demolition or inappropriate gigantification in historic districts should not be a part of this CPIO. Discretionary actions in Hollywood over the last 10+ years have been massive entitlement “giveaways” , exceeding densities in both the 1988 Plan and this new upzoned Plan, but never required affordable housing or public benefits. This CPIO cannot load the genuine affordable housing need on to fragile historic areas—after the City pushed through maybe 7,000 units of unaffordable housing in central Hollywood, and stood by while massive amounts of older serviceable housing was demolished.
- **Prohibition on demolition:** The most economically successful downtowns have profited greatly from outright prohibitions of historic resources. Investment can pour into existing buildings, adaptive re-use, etc. Matched with municipal bridge loans for developers restoring historic buildings, validated parking and resolved traffic issues, re-use of upper floors, and coordinated marketing the historic buildings offer a springboard for renaissance in Hollywood.

6 KEY ELEMENTS FOR PRESERVATION PLANNING IN THE CPIO: Hollywood Heritage has divided our comments in this letter into 6 categories—using the basic concepts of Preservation Planning.

1. **Identification** of individual historic buildings and historic districts: Is identification clear and complete? Is it readily publicly available and understandable? Is there a clear “context statement”—this is a scholarly weaving together of the narrative history of Hollywood and the buildings which are significant to interpreting that history? Are the

statuses clear—National Register, California Register, Los Angeles, Redevelopment Area 511 List.

2. **Mapping** of individual historic buildings and historic districts: In integrating historic buildings into Land Use and related Plan Elements, are the locations, densities, heights, urban design characteristics of the buildings and districts mapped clearly and accurately?
3. **Land Use Planning:** Integration of preservation planning into land use planning: As preservation is a stated goal of the Plan and CPIO, have the historic areas been integrated into Land Use and Zoning recommendations? How? Where? With special zoning to prohibit demolition? With down-zoning to remove the incentive to demolish?? With compensations such as a clear TDR system and special design guidance built into the zoning to re-use existing historic buildings?
4. **Treatment of historic buildings:** means “how will maintenance, alterations, additions, and new infill buildings be designed, and who are the experts who determine whether standards are being followed?” What must be submitted for design review and when? Los Angeles policy in the Conservation Element applies the Secretary of the Interior Standards for Rehabilitation as the “treatment standards”. For HCM’s the Office of Historic Resources makes this determination, and for HPOZ’s in Los Angeles new buildings in historic districts must be also evaluated by OHR.
5. **Implementation – carryover of current rules in 1988 plan, redevelopment plan:** What are the current protections in the 1988 Community Plan? What are the current protections in the Redevelopment Plan? (See Attachment #3). Are they carried forward?
6. **Environmental Impact:** Is the CPIO accompanied by environmental review?

DOES THE CPIO SUCCEED IN THE 6 ELEMENTS OF PRESERVATION PLANNING?

Hollywood Heritage’s preliminary review of CPIO: The Draft CPIO states on Page 2 that Historic Preservation is one of its 3 goals, and on Page 5 lists the “intent” to “establish review procedures for projects involving designated and certain eligible historic resources. Establishing such procedures will provide opportunities for the identification and consideration of preservation alternatives.” (It is hoped that this last phrase means “alternative ways to preserve”!)

		Does the CPIO adequately cover these?	Actions
1	Identification/ Listing of individual historic resources and historic districts	<p><u>HPCU and CPIO must be consistent and coordinated</u> in identifying and mapping the established status of historic buildings. Historic buildings are not enumerated in the CPIO, so it is critical that they are correctly identified in the HPCU—especially Appendix L. Our organization responded previously that the lists in the HPCU are incorrect, incomplete and out of date.. Attachment #3 to this letter goes into greater detail, and Attachment #4 is the correct list.</p> <p><u>How identified:</u> The CPIO distinguishes between two types of historic resources (Page 91):</p> <ul style="list-style-type: none"> • <u>“Designated Historic Resource:</u> A building, structure, object, landscaping element, or natural feature listed or designated as a historical resource, either individually, or as a contributor to a district at the local, state, or national level.” • This means buildings listed locally as HCMS or in HPOZs; on the California Register (such as Afton Sq district); and on the 	<p>Some corrections needed</p> <p>HPCU EIR lists etc that must be updated/ revised.</p> <p>HHI has prepared a complete and vetted compendium of lists</p> <p>Director should accept as</p>

		<p>National Register—as individual properties or as districts. The CPIO definition of “designated” excludes non-contributors to listed historic districts.</p> <ul style="list-style-type: none"> • “Eligible Historic Resource”: Includes all of the above, plus sites “as a contributor to a historic district under a local, state, or Federal designation program through SurveyLA...or another historic resource survey completed by a person meeting the Secretary of the Interior’s Professional Qualification Standards for Historic Preservation and accepted as complete by the Director, in consultation with the Office of Historic Resources This term does not include a non-contributor to an eligible historic district.” • This definition covers the high concentration of historic buildings in central Hollywood identified by the Community Redevelopment Agency—known as the “511 List” or the “ARG Survey” 	<p>complete the ARG survey, with revisions per HHI peer review, prior to adoption of this HPCU, or change this language.</p> <p>CPIO should have precise data for historic resources, or precise references to where to find it.</p>
		<p>Extent of CPIO: (Page 3 of CPIO) The CPIO was promised to cover the entire Redevelopment Area—it does not. See Map #2 (Attachment 2)</p> <p>Public information on resource identification: Three decades of work by experts means there is clear information on what the historic buildings and Districts are; why they are significant; what status level is assigned to them; where they are; and even what features of buildings and districts define their character.</p> <ul style="list-style-type: none"> • Today, City Planning has much of the needed information uploaded on websites—but not all in one place or consistently. • The Hollywood Community Plan and EIR were prepared and issued without the benefit of SurveyLA and the CRA Sec 511 inventory. • CPIO states that there would be review from OHR on historic district infill but there is nothing to alert potential land buyer that there are restrictions to new infill unless the sites are identified. • ZI 2488 the current solution to the inconsistencies in City data <ul style="list-style-type: none"> • ZIMAS: Non-contributors are not identified in Zimas –some are in NavigateLA—which is generally more accurate. 	<p>Extend the CPIO to the entire Redevelopment Area</p> <p>HHI has prepared reviews of the inconsistencies and omissions of current websites. This is a separate topic we are glad to discuss</p>
		<p>Include District Non-Contributors - See discussion in Attachment 4. District non-contributors are a part of historic districts—they met the qualifications to be included in the District boundary. Detrimental effects can come from removal of these without sufficient research, especially in Hollywood; to the District as a whole from their removal; from replacement with infill that does not comply with the Secretary of the Interior Standards, and specifically Preservation Brief #14</p>	<p>Include non-contributors as identified resources</p>
		<p>Context statement for Hollywood missing: Community Plan Chapter 5 offers a partial narrative history. What is fundamental for planning is known as a “context statement”. This was required as a part of CRA’s responsibilities to date their work is incomplete. A “context</p>	<p>Community Plan Chapter 5 should have Hollywood</p>

		statement” “connects” the narrative and chronological history to the extant building types, their locations, the relation of style to use and type, etc., etc—as an essential and tailored foundation for deciding which buildings have cultural or architectural significance	Context Statement
2	Mapping of individual historic resources and historic districts:	<ul style="list-style-type: none"> • Maps found on page 3,69,77, and78 CPIO • Boundaries of historic districts: Some precise boundary mapping errors • Missing historic districts: See Map #1 and 2 • Clarity is missing on districts established under the National Register and California Register, and what regulations they fall under regulations 	Some adjustments needed Hollywood Heritage has mapped all this is GIS format and can share
3	Land Use Planning: Integrate preservation into Land Use Map and Matrix	Community Plan and CPIO-- preservation not integrated into land use planning --Land Use Plan (proposed zoning) is antithetic to preservation. CPIO affordable housing incentives are a form of upzoning, but with restrictions applied after-the-fact: <ul style="list-style-type: none"> • Result #1--Promotes demolition of historic buildings- must be corrected: CPIO “incentives” added on top on upzoning. Historic areas can and should be protected—they are only a fraction of the Community Plan area. (Afton, Selma La Baig etc need incentives removed unless following “better alternatives” below”) • Result #2: Promotes density and land price inflation, and then clamps down later with design review and then stop them once they submit for a permit”. • CPIO attempts to clamp down to force compatibility- but without showing area-specific templates which provide an understanding of the effect of incentives, the CPIO cannot be evaluated 	No
		Historic areas should be mapped overlain on Land Use Maps” <ul style="list-style-type: none"> • Incentive areas in CPIO overlay on Land Use Map • Upzoning in Community Plan Update maps overlay on historic buildings and districts. • “Overzoning” in historic areas left over from 1988 Plan 	Provide clear overlays
		Better alternatives to upzoning: <ul style="list-style-type: none"> • re-use pre-approval and parking waivers to increase affordable housing without removing historic structures--_converting disused commercial upper floors to residential; creative and proven methods for adding back wings without touching street-front facades; changes of use and occupancy without code upgrades; extension of Adaptive ReUse Ordinance to Hollywood • Remove affordable housing densification incentives in historic areas 	Develop practical alternatives to upzoning and incentives
		CPIO misses protections for the Franklin Avenue Design District: Historic areas and landmarks between Franklin Avenue and Hollywood Boulevard are treated as incentive areas for demolition, without recognition of the needs for preservation and special design quality as clearly shown in ARG study and Redevelopment Plan	Special study required
		Transfer of Development Rights: The CPIO has a draft proposal for a TDR program, but 3 vital ingredients are missing:	HHI is continuing to analyze

		<ol style="list-style-type: none"> 1. Mapping of where receiver sites may be so not to cause further damage to historic districts; 2. A mathematical/ economic analysis of what transferrable rights are pragmatic and realistic, given the high density zoning already on small parcels, and should be assigned to historic buildings to help them economically; and 3. requirement that discretionary entitlements seeking added FAR purchase transferred rights, rather than have them “gifted” for no public benefit as happens regularly today. A fairer and more successful system would give excess FAR to historic buildings specifically only for TDR transfer, and would reduce densities elsewhere. <p>To date the approach to “incentives” and upzoning unfairly treats historic property owners. A TDR process—applied with knowledgeable economic underpinnings—could correct that.</p>	
4	Treatment of historic buildings and design review	<p><u>CPIO does not propose changes to current treatment for “designated” City historic buildings-</u> Permits are reviewed by the Office of Historic Resources</p> <ul style="list-style-type: none"> • <u>Local Cultural Heritage Monuments:</u> provides identification; protection via alteration reviews and 1 year delay of demolition. Review is by OHR • <u>Local Historic Preservation Overlay Zones:</u> (all in Hollywood’s residential areas): provides identification; requires alteration reviews and new infill building conformance. Review is by Planning, HPOZ Board advice; OHR. • <u>California and National Register-designated buildings—</u>unclear process- OHR has stated in meetings and in transfer documents that these properties are flagged and reviewed. <p><u>CPIO unclear about “designated” resources” in entitlements:</u> Design review and CEQA review for projects asking for entitlements which exceed current zoning and may affect historic buildings.</p> <p><u>CPIO proposes different treatment for surveyed resources in Redevelopment Area, and Survey LA</u></p> <ul style="list-style-type: none"> • Alterations and additions_(Page 5, 6 and 7 of CPIO) • <u>New construction in historic districts:</u> (Page 73, 80, 81, and 82 of the CPIO) CPIO proposes using height and setbacks of adjacent buildings to guide infill in Character Residential areas. A better approach is synthesizing the urban patterning characteristics and being compatible. Some districts aren’t entirely uniform. <p><u>Non-contributors:</u> See above and Attachment #4</p>	<p>HHI reviewing CPIO in detail- may have additional comments</p>
		<p><u>CPIO Development Standards--</u> Standards (for example on page 29-30) cannot be applied to historic buildings with analysis first of conformance with Secretary of the Interior Standards . Regulating the “pedestrian experience” is a highly worthy starting point, but in historic areas the design must be more specifically tailored to the existing types and styles of buildings—not as if all is new. The brevity of the development standards is misleading—they don’t deal with alterations, additions etc in a manner conforming to the Secretary of the interior Standards—they seem to be aimed at new construction.</p>	<p>HHI will provide mark up of Development Standards</p>
5	Implementation: carry-over of	<p><u>CPIO must carry over all Redevelopment Plan planning obligations, or those requirements will stay in effect from the Redevelopment Plan.</u></p>	<p>CPIO does not carry these plans over- thus</p>

<p><u>protections</u> from the Hollywood Redevelopment Plan;</p>	<ul style="list-style-type: none"> • <u>Attachment #3</u> contains excerpts from the Redevelopment Plan which transferred to the City of Los Angeles. The following are selections from it- preservation planning essentials which the CPIO was required to pick up—or the requirements remain to be met under separate reviews and approvals under the Redevelopment Plan • <u>Sec 409.1 Rehabilitation and Conservation:</u> It shall be the purpose of this Plan to encourage the retention of existing structures by a program of conservation and rehabilitation when consistent with the provisions of this Plan. All rehabilitation undertaken in the Project Area shall conform to such rehabilitation standards. The rehabilitation of buildings determined by the Agency to be of architectural and/or historical significance shall be rehabilitated in accordance with the "Secretary of the Interior's Standards for Rehabilitation". • <u>Sec 502.2 -- Franklin Avenue Design District Plan:</u> "a detailed design plan ...which addresses preservation of architecturally and historically significant buildings, parking, circulation, views..." • <u>Sec 506.2.1 Hollywood Boulevard Urban Design Plan:</u> "urban design plan including design guidelines and criteria and a parking and circulation program to meet these objectives.. All new development in the District shall meet the design guidelines..may include a reduction of density" The objectives of the District are to: <ul style="list-style-type: none"> 1) Encourage preservation, restoration and appropriate reuse of historically or architecturally significant structures; 2) Assure that new development is sympathetic to and complements the existing scale of development; 3) Provide pedestrian oriented retail uses along the street level; 4) Encourage entertainment, theater and tourist related uses; 5) Provide adequate parking for new and existing uses; and 6) Reinforce and enhance the existing pedestrian environment. <p>The Design(s) for Development may include a reduction of density by up to 33% in certain areas to insure that the objectives of the District are met.</p> • <u>Sec 518.2 refers to Hollywood Boulevard Urban Design Plan</u> "An urban design plan for Hollywood Boulevard will be prepared pursuant to Section 506.2.1 of this Plan. This Plan will include a strategy to address the long-term parking needs of Hollywood Boulevard. Pursuant to Section 506.2.3 of this Plan the Agency shall monitor the off-street parking supply within the Regional Center Commercial Designation. " • <u>Section 505 "Residential Uses"</u> :: "Within portions of the Project Area designated for residential use there are clusters of single family homes and architecturally and/or historically significant buildings or groups of buildings. There is also a need for additional parking. Therefore, in order to enhance the environmental quality of residential areas Design(s) for Development may be adopted to: <ul style="list-style-type: none"> 1) Ensure that the scale, density, bulk and general architectural style of new development is compatible with the architectural and/or historical features of a neighborhood; 2) Reduce the permitted density of an area below that density otherwise permitted in order to preserve clusters of houses; and 3) Ensure that an appropriate amount of parking is provided for residents of the area. 	<p>they remain as a part of the Redevelopment Unit plan and entitlement review obligations,</p>
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		<ul style="list-style-type: none"> • Hollywood Core Transition District Plan (aka Sunset District Plan) : (Sec 506.2.2) “Properties designated on the Redevelopment Plan Map as "Hollywood Core Transition District" shall be given special consideration due to the low density of the adjacent residential areas. The objective of this District is to provide for a transition in the scale and intensity of development between Regional Center Commercial uses and residential neighborhoods. The Agency shall review all permits in this District to ensure that circulation patterns, landscaping, parking, and the scale of new construction is not detrimental to the adjacent residential neighborhoods.” 	
	Implementa- tion- Carryover of protections	<ul style="list-style-type: none"> • Community Plan Protections : The 1988 Community Plan included as an integral part the Redevelopment Plan requirements for TDRs, proactive listing of identified buildings as HCMs and HPOZs, and Specific Plans (noted immediately above) 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. • Federal listing protections 	
6	EIR	<ul style="list-style-type: none"> • CEQA review of CPIO (“Implementation Overlay”) is required: The effect of density incentives on all the integrated parts of the Community Plan—population and demographics, utilities, parks and open space, transportation, utilities, etc—must be analyzed under CEQA. The current DEIR did not anticipate this—in fact, even if this CPIO is presented as a substitute for the TOC regulations in the Zoning Code, those had no environmental review, and exceeded the authority of the vote under which they were initiated. That is no substitution or excuse for skipping CEQA review. 	CEQA review of effects of CPIO is required
		<ul style="list-style-type: none"> • CEQA cannot be compromised by a CPIO announcing in advance that a project has no adverse effect 	
		<ul style="list-style-type: none"> • Mitigations required: The General Plan Framework acknowledges that “Significant effects to cultural resources in each CPA would occur if population increases in areas of historic districts and historic sites.” This is such a case. The Framework directs mitigations so that this impact does not occur, but the CPIO does not yet deliver. Similarly, the Redevelopment Plan EIR required an extensive list of land use actions (see Attachment #3 and the Redevelopment plan EIR) which the City must apply now that CRA obligations have transferred to the City. • Removing altered contributors and non-contributors does effect an historic district, because District boundaries were established including the altered contributors and non-contributors, with a designated and approved composition. Altering that composition may be an adverse effect. 	

In Attachment #1 Hollywood Heritage includes a listing of what documents we have found and reviewed pertinent to the Hollywood CPIO, and what comments HHI has submitted over time regarding historic buildings and the Hollywood Community Plan.

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.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Atkins". The signature is written in black ink on a white background.

President, Hollywood heritage

ATTACHMENT #1

PRIOR INPUT FROM HOLLYWOOD HERITAGE

The Community Plan Update Process has been lengthy, however, so we want to summarize prior communications and salient documents. This is a work-in-progress.

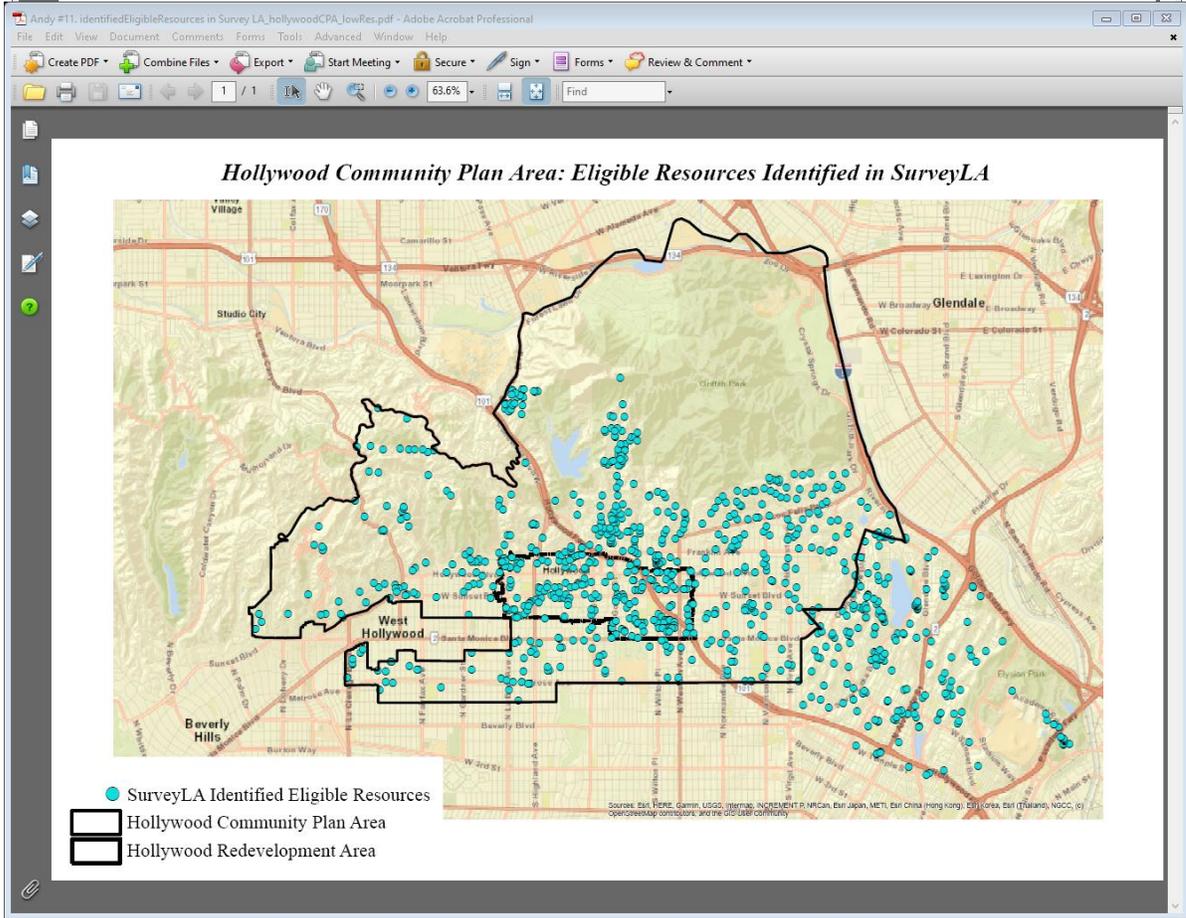
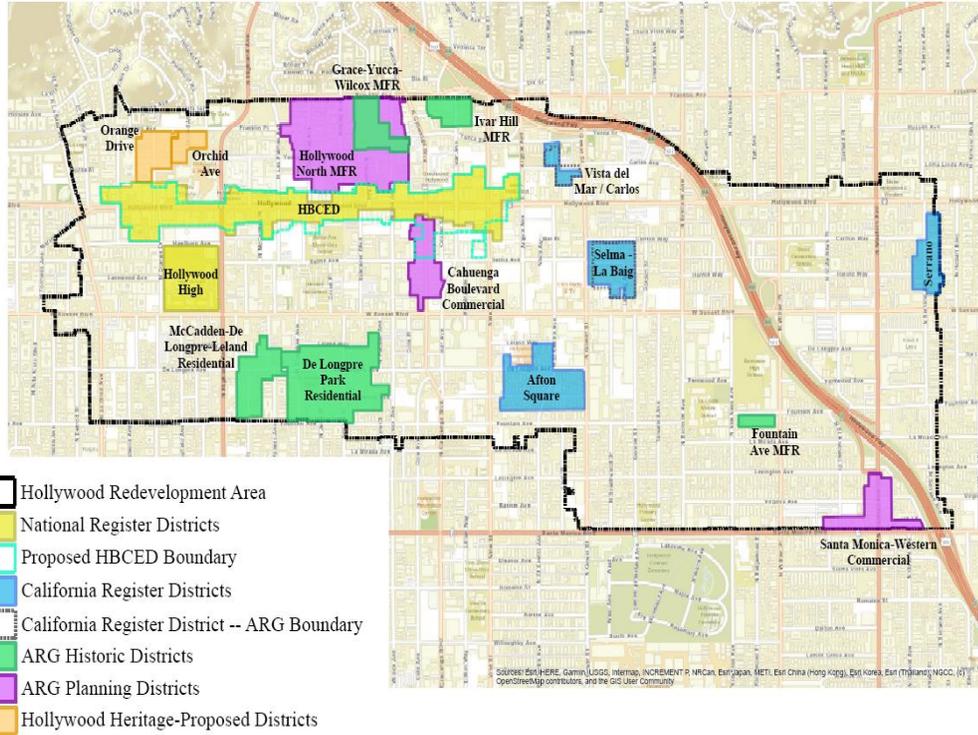
2012		Community Plan EIR concludes that City's proposed Plan has significant adverse impacts, which were stated to be unavoidable.
2014		
2016 June 16	HPCU EIR Notice of Preparation	<ul style="list-style-type: none"> • Land Use Element (land use maps; parcel- by parcel-Matrix for zoning, Q,D Conditions; plan text for Land Use) must integrate preservation. Conflict mapping missing. Incorrect boundaries of historic areas. Proposed upzoning (or "overzoned" existing zoning) makes current conflicts worse. . Plan – upzoning and incentivizing demolition on many parcels while stating that Preservation is the goal • Implementation- Implementation tools built into the 1988 Community Plan, Redevelopment Plan, General Plan, etc have NOT been carried forward into Plan Text, including listing of all identified historic buildings as HCMs; Hollywood Boulevard Urban Design District; Hollywood CoreTransition District protections; TDRs; design guidelines; downzoning, etc Implementation cited in EIR must be real—references to Cultural Heritage Commission and OHR review cannot be put forth in an EIR if they are nonexistent. SurveyLA's existence is not a mitigation without follow-up protections and processes. Secretary of the Interior Standards_must be stated._____ • Plan Text: Many good preservation-related stated goals and policies are in direct conflict with the actual • EIR: EIR must thoroughly identify historic resources and analyze the impact of land use decisions on the existing historic buildings. EIR must identify CEQA thresholds being applied. • Conflict Map attached to HHI Letter- Subareas with conflicts identified
		<ul style="list-style-type: none"> • Under State law, all land use planning must integrate and be consistent with Transportation,
2017 June	Draft CPIO	<p>"No demolition permits for structures more than 45 years old shall be issued until the applicant has:</p> <ul style="list-style-type: none"> - Conspicuously posted a demolition notice on the property - Sent letters to abutting neighbors, and - Notified the applicable Council District Office at least 20 days 30 days in advance of demolition' <p>"No demolition permit shall be issued for any project unless a new project has been reviewed and approved by the Director of Planning"</p>
	Draft EIR	<ul style="list-style-type: none"> • Appendix L "Designated Resources in the Hollywood CPA" listing of addresses- missing all HCMs, SurveyLA results, etc on p 4.5-26—list should be integrated
2019 January	HHI Response to Draft EIR	<ul style="list-style-type: none"> • Significant adverse effect of Plan on historic resources unacceptable- Plan needs work to eliminate • DEIR inadequate- conclusions reached with no analysis or pursuit of better alternative, No integration of historic areas mapping with proposed upzoning

		<ul style="list-style-type: none"> • No DEIR credible Alternative to protect historic buildings while at the same time allowing growth—no detailed investigation of how • Omission of role of CRA and its identified historic buildings and its obligations to preservation—which now have transferred to City Planning • Disconnect between Plan Text and Plan- Preservation Chapter has good intent- not carried through in Land Use or Zoning
2020 August	Draft CPIO District (secured) Issued	Reviewed in current document dated Dec 15, 2020
2020 August	HCPU Update Powerpoint—	<ul style="list-style-type: none"> • “Refreshed” Community Plan Policies and Programs (Hillside areas and rent protection!!!) • “Refreshed” Preservation Chapter in Plan Text • “Refreshed” Plan and Zoning maps- Upzone Media District (1.5:1 to 3:1) and allow commercial. HCR regs • CPIO “overhaul”
2020 August	Revised Community Plan Text	•
2020 August	Revised HPCU Matrix	•
2020 August	CPIO Fact Sheet FAQ	•
2020 August	“Explainer” Doc – Historic Preservation	•

ATTACHMENT #2

MAP #1

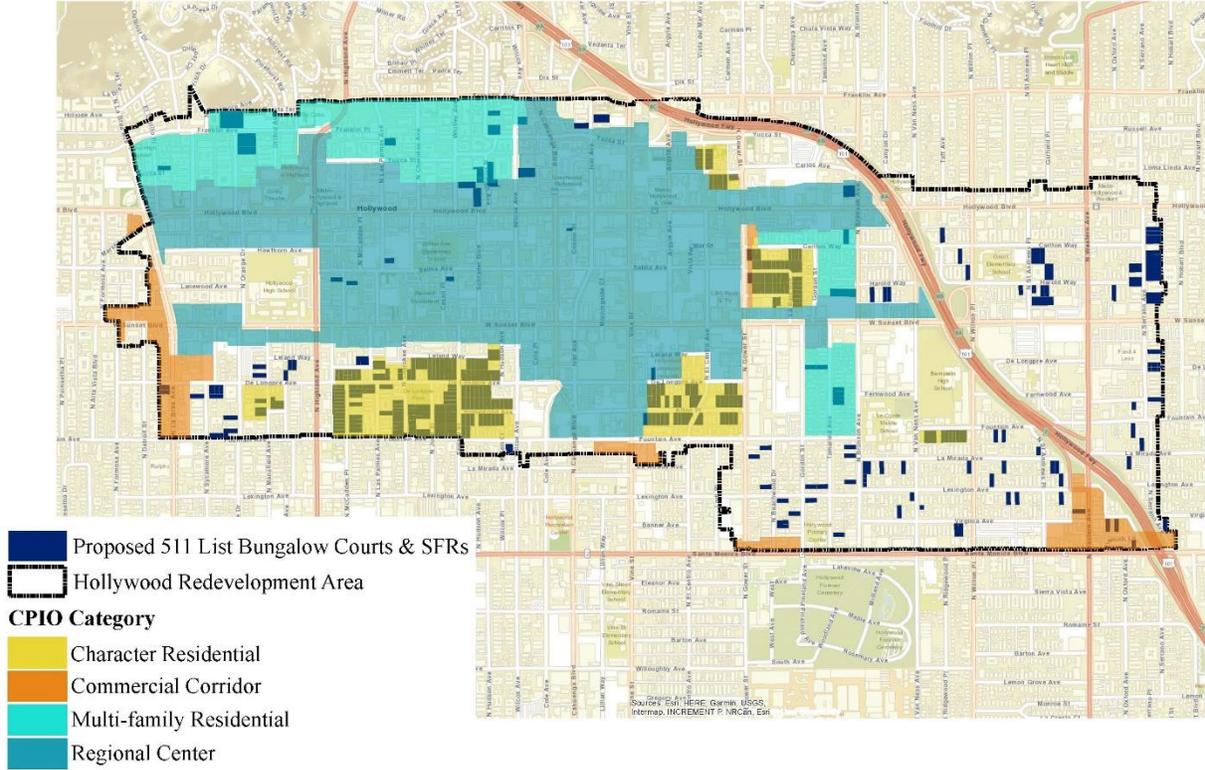
Hollywood Redevelopment Area: All District Boundaries (Existing and Proposed)



ATTACHMENT #2

MAP #2

Hollywood Redevelopment Area: Proposed CPIO Boundaries and Proposed 511 List Members (Bungalow Courts & SFRs Only)



Character Residential CPIO Subarea

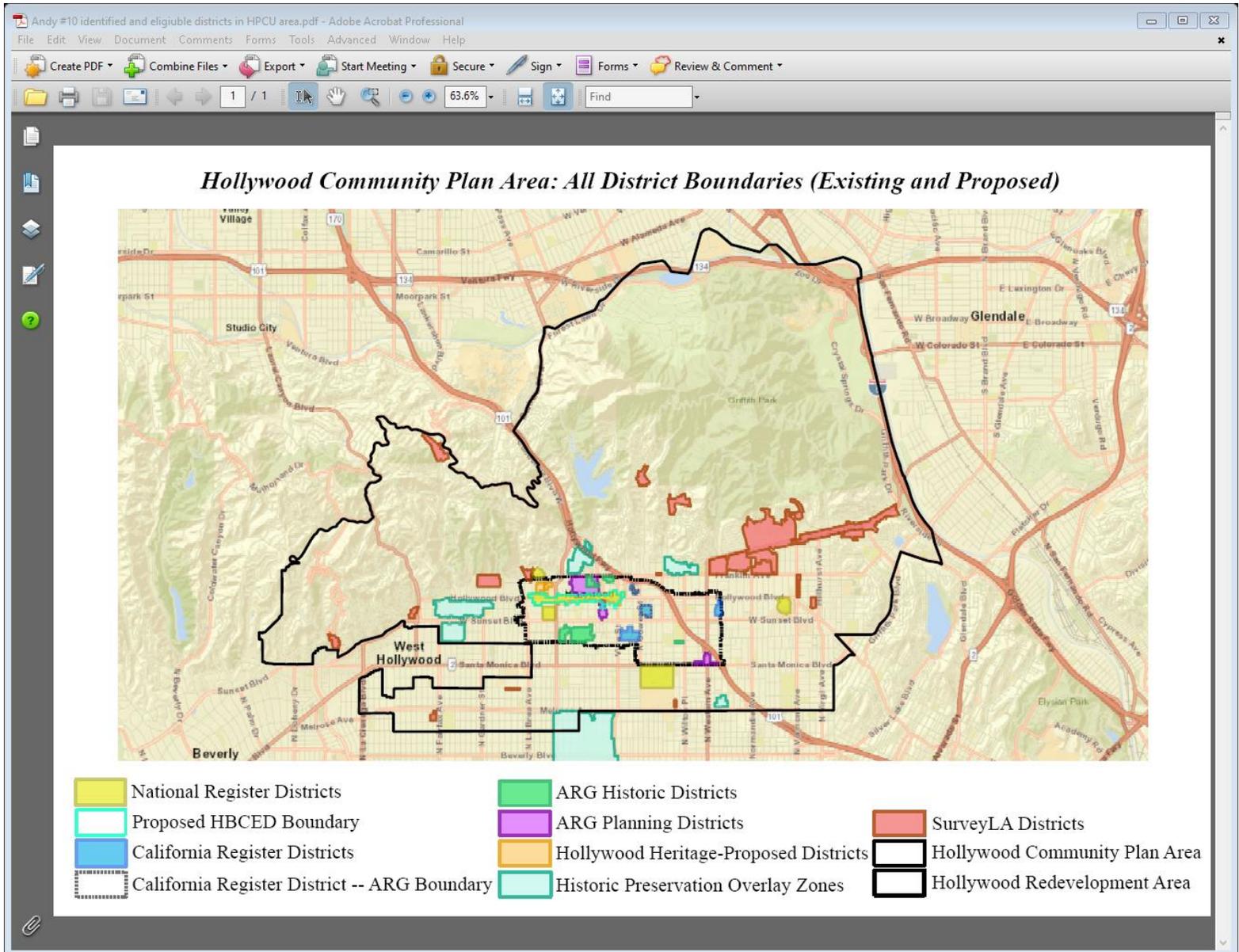
The Character Residential CPIO Subarea seeks to protect historic resources, maintain FAR and height limits, encourage continued use of existing structures, guide contextual new development, incentivize parking reductions, and create incentives for 100% affordable housing projects.

The locations of the Character Residential (CR) Subarea are indicated in Figure 17 below.



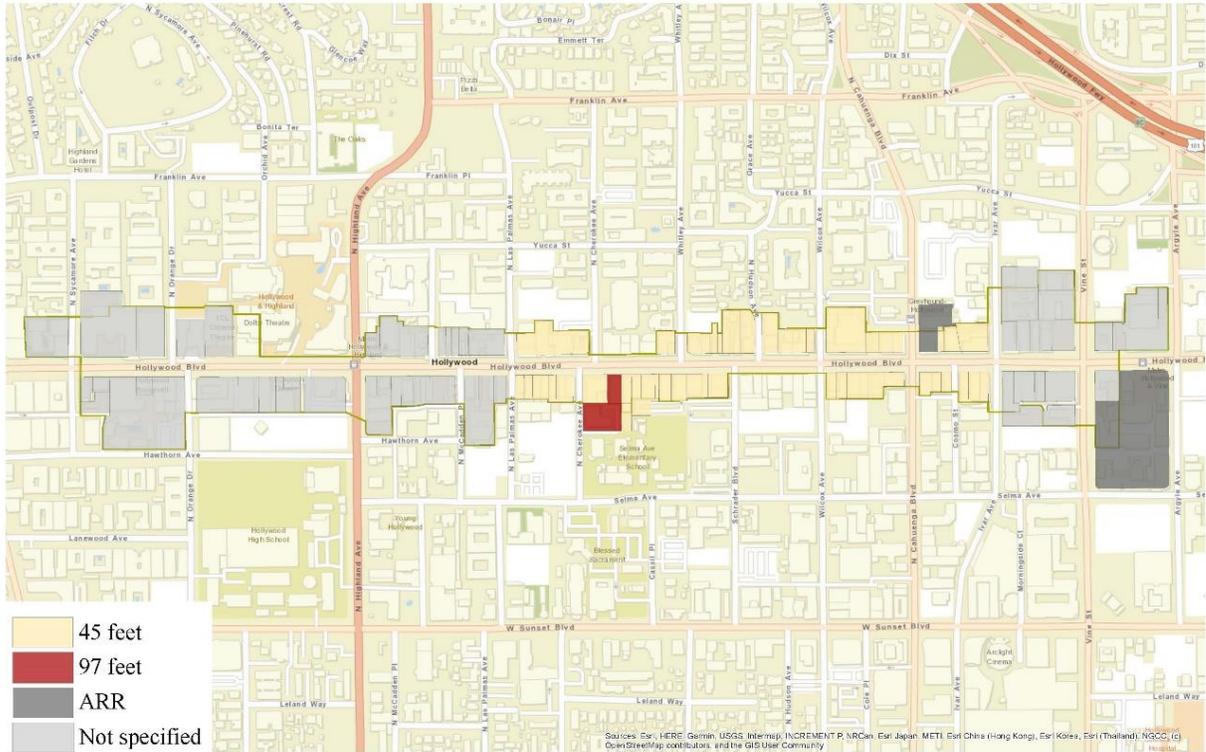
Figure 17: CPIO Character Residential Subarea
 This map is for informational purposes only. Existing regulations are available at zimas.lacity.org, and proposed regulations are available at planning4la.org/hcpu2.

Map #3



Map #4

HBCED National Register District: Proposed Maximum Height by Parcel



ATTACHMENT #3

CRA Planning Responsibilities from Nov 2019 Transfer (submitted previously)

A. Redevelopment Plan (and City Planning) Mandates to Identify and Protect Historic Buildings

1	CPC 86-835 GPC Cultural Heritage	Historic Listing and Protection Requirement: Affects 134 landmarks. CRA was required in this case to <u>list all National Register Status Code 1-3 buildings as Cultural Heritage landmarks</u> , affording Cultural Heritage permit reviews. CRA sent the list—City failed to list. City created a ZI (ZI 1812) so that Plan Checkers send applicants <u>back</u> to CRA. City Planning has stated to HHI that they are conducting these reviews
2	Redev Plan—CRA- Sec 511	Listing/Public Information: “Agency ..shall maintain publicly available list of all buildings within the Project Area which it determines to be architecturally and/or historically significant.” CRA identified 1,078 known landmarks at outset of Chattel survey
3	Redev Plan—CRA- Sec 511	Protection requirement- delay of any kind of permit/ delay of demolition: Buildings listed by CRA, CHM, CHRIS, and National Register deemed to be of architectural significance; procedures for design review for alterations and for delay of demolition for 180 days process, extendable to 360 days.
4	Redev Plan—CRA- Sec 511	Scorched Earth- bonus denial: “ The Agency shall deny requests for housing incentive units, development in the Regional Center Commercial designation above an FAR of 4.5:1 and variations for sites on which a structure determined by the agency to be significant was demolished after the adoption of this Plan or is proposed to be demolished”. (Note exempts SB 1818 increase)
5	Redev Plan CRA 2003 EIR	Listing/Public Information: 2003 EIR identified and extended protections through Mitigation Measures to 448 landmarks_“In order to not report any significant effect under CEQA, the mitigation measure states “Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior Standards for Rehabilitations”.
6	CRA-HHI Settlement	Protection requirement- delay of any kind of permit/ delay of demolition: In absence of CRA meeting obligation for completed historic survey and listing, established process for CRA to consult with Hollywood Heritage on status of any building having a demolition permit application, and invokes delay of demolition for building

B. Redevelopment Plan Mandates for Design Review of Alterations, Heights and Density, and Effects of New Construction

	Redev. Plan	
1	Redev Plan—CRA- Sec 409:	Design Review: All rehabilitation undertaken in the Project Area..determined by the Agency to be or architectural and/or historical significance shall be rehabilitated in accordance with the Secretary of the Interior Standards
3	Redev Plan—CRA- Sec 505.4 and 506.3:	Design/permit review: Agency must review commercial uses in residential areas and residential uses in commercial areas
4	Redev Plan—CRA- Sec 506.2.1	Design Review: Hollywood Boulevard District Urban Design Plan required in 5 years, including design guidelines, may include a reduction of density up to 33%
5	Redev Plan – CRA Sec 407.1.4	Design Review: All development plans (whether public or private) shall be subject to review and approval by the Agency
5	Redev Plan- CRA Sec 505.1	Design review for any project exceeding 80 du/acre
6	HHI Settlement Agreement signed by City	Follow 1993 Urban Design Plan “Until the deadlines stated in this Agreement for the preparation of an update of the 1993 Design Plan have been met, CRA/LA agrees that any new project...in the Hollywood Boulevard Urban Design Plan area shall be subject to review by CRA/LA, which review shall include without limitation ...the 1993 Design Plan, until the deadlines stated in this Agreement for preparation of an update of the Plan have been met. CRA/LA shall distribute the 1993 Design Plan to all new project applicants”

C. Mandated CRA Obligations re Incentives/ Affirmative Actions/ Land Use Limitations

Redev. Plan	
Redev Plan—CRA- Sec 505	Planning: Any residential area with architecturally or historically significant structures may be further planned to reduce allowable density, require compatible design, ensure adequate parking, and conserve structures
Redev Plan – CRA Sec 505.3	Limits on Housing Incentive Units: Agency will limit housing incentive units
Redev Plan—CRA- Sec 511	TDRs “The Agency shall promulgate procedures for such transfer proposals(and shall) obtain adequate assurances that the building from which the density transfer is taken are preserved and the development on the site to which the density is transferred will occur in conformity with the Redevelopment Plan, the objectives of special districts as established by the Plan and if applicable, any adopted Design for Development”
Redev Plan—CRA- Sec 506.2.3	Monitoring traffic: Required to make annual reports on buildout of FAR in Regional Center relative to traffic metrics; required to review all density increases above 4.5:1 and when Regional Center density reaches 2:0:1 FAR to establish specific methods and mechanisms to acquire open space or otherwise restrict or decrease density
Redev Plan—CRA- Sec 518 and 518.2	Transportation Planning: Plan required, including planning to ameliorate undersupply of parking in Hollywood Boulevard. Agency to monitor off street parking supply

D Mandated Plans in Redevelopment Plan—not completed by CRA, so required to be prepared by City Planning

	Implementation
<p>Franklin Avenue Design District Plan</p> <ul style="list-style-type: none"> • Redevelopment Plan Reqts: Sec 505.2: “a detailed design plan ...which addresses preservation of architecturally and historically significant buildings, parking, circulation, views...” 	<ul style="list-style-type: none"> • Community Plan to adopt HBUDP as a Specific Plan?
<p>Urban Design Plan Hollywood Boulevard Historic District</p> <ul style="list-style-type: none"> • Redevelopment Plan Reqts: Sec 506.2.1 and 518.2; “urban design plan including design guidelines and criteria and a parking and circulation program to meet these objectives..All new development in the District shall meet the design guidelines..may include a reduction of density” 	<ul style="list-style-type: none"> • Community Plan to adopt HBUDP as a Specific Plan—Integrate into Community Plan and change current D condition to permanent 2:1 FAR? • Until HBUDP adopted, HHI Settlement Agreement requires all projects proposed for alterations, demolition, building permits, or discretionary actions to follow 1993 UDP as follows: enforcement through <u>CRA</u> • Interim mandated review as a part of all building permit and Planning applications; any environmental review to evaluate projects covered by 1993 UDP in all details and guidelines
<p>Hollywood Core Transition District Development Guidelines</p> <ul style="list-style-type: none"> • Redevelopment Plan Reqts: Sec 506.2.2.: “properties...shall be given special consideration due to the low density..provide for a transition in the scale and intensity of devt” • Redev Plan Sec 506.2.2 “The Agency shall review all permits in this District to ensure that circulation patterns, landscaping, parking, and the scale of new construction is not detrimental to the adjacent residential neighborhoods.” 	<ul style="list-style-type: none"> • HHI prepare a list of conditions for any development affecting the residential neighborhoods for adoption by CRA • Incorporation as “D” conditions in Community Plan Zoning for affected properties
<p>Transportation and Parking Standards Ordinance</p>	<ul style="list-style-type: none"> • Integration of iteris studies into Community Plan and EIR

	<ul style="list-style-type: none"> • City Planning to perform CRA annual reports • Fund CRA completion of 2:1 calculation for Regional Center • Parking study and review
<p><u>Updated Cultural Resources Survey</u></p>	<ul style="list-style-type: none"> • CPIO in Community Plan was to include all CRA addresses • CRA reserved right to alter standards of integrity in response to special circumstances in Hollywood—relative to Survey LA definitions • All “lowering” of status codes to be reviewed for loss of integrity; if loss of integrity due to remodeling since date of initial higher survey listing, or due to non-Hollywood integrity description in Survey LA • Review Hollywood Boulevard District with reference to 2014 submittal to State Office of Historic Preservation; HHI to provide review and map of existing District boundary (which is 35 years old) and proposed District boundary and contributors. New contributors to be identified with a 1D; non contributors to be identified with a ZI—subject to Sec 511 procedures
<ul style="list-style-type: none"> • <u>Redevelopment Plan Req’t</u>: Publicly available list • <u>Settlement Agreement Req’t</u>: Publicly available list “uploading to CRA website is acceptable” “a printed version of the Section 511 list shall be provided to members of the public on request and at reasonable copying charges” <p><u>Background</u>: Preservation.lacity.org\SurveyLA findings and reports\Hollywood\Hollywood Redevelopment Project Area\Property Index (HHI has copy) – file path changed 2020</p>	<ul style="list-style-type: none"> • This is a non-searchable and non-mappable format. • To find an individual property there are 7 parts no index • Until data is mappable by the public from ZIMAS—as opposed to simply verbally connected to ZIMAS by marking “yes” on Historic Review, and searchable by address, City Planning will put a ZI on all parcels in the Redevelopment Area
<p><u>Density Transfer Procedures (to incentivize preservation)</u></p> <ul style="list-style-type: none"> • Redevelopment Plan Reqts • Settlement Agreement Reqts: 	<ul style="list-style-type: none"> • <u>Donor and receiver map</u>: from 1993 UDP • City agree no discretionary increase in density in Regional Center Commercial without equal compensatory reduction of development in historic building area

E. Mitigation Measures carried forward from Hollywood Redevelopment Plan EIR

1	Redev Plan CRA 2003 EIR	EIR review: Projects proposed in proximity to a cultural resource “the Agency will require a study to be made by a qualified architectural historian to determine whether the proposed development would result in substantial adverse change in the significance of the historical resource
2	Redev Plan 2003 EIR	Design Review Mitigation Measure: “In order to not report any significant effect under CEQA, the mitigation measure states “Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior Standards for Rehabilitations”. This restates the requirements in the Redevelopment Plan

F. Are Current City Planning Mandates for Identify/Protect Historic Buildings in 2018 Draft Community Plan EIR?

1	City Planning Affidavit	Hold on demolition: Planning agreed December 16, 2016 with Hollywood Heritage that they can and will institute an Affidavit Process—Applicants will be required to sign a statement indicating “This permit (including every demolition permit) request is not a part of a larger project.” . This is to stop the common practice be certain developers for piecemealing, which violates CEQA.
2	Cultural Heritage Ord	Listing/Public Information/ Protection requirement: Listing of Cultural Heritage monuments (mapped on Navigate LA); Building permit review for alterations. Possible delay of demolition
3	HPOZ	Listing/Public Information/Protection: Listing of single family neighborhood HPOZs outside of Redevelopment Area.
4	HPOZ’s under consideration	Listing/Protection: Listing of new single family neighborhoods proposed outside of Redevelopment Area
5	Comm Plan 1986	Protection: TDR and preservation as justification for 6:1 FAR
6	Comm Plan 2012	Protection: (Areawide) “D” Conditions on parcels with historic buildings
8	General Plan Conserv Element	Listing/Protection <ul style="list-style-type: none"> • City Planning and LADBS: Development permit processing, monitoring, enforcement, and periodic revision of regulations and procedures • Element: Prepare the Historic Preservation and Cultural Resources Element of the Community Plan • Identify: Continue to survey buildings and structures... including context • HPOZs
9	2018 Comm Plan DEIR	Listing/Public Information
10	2018 Comm Plan DEIR	Conflict Mapping, Analysis, and actions to reduce impacts

G. What are Mitigation Measures possible for the HPCU, in addition to adopting all of the CRA protections :

1	Clarify public benefits:	The cornerstone of CRA’s authority for discretionary approval of high densities in the 2005 Redevelopment Plan is intended to be twofold: traffic and parking mitigations, and a Transfer of Development Rights Program. City Planning not allowed to approve discretionary higher densities under Redevelopment Plan without providing the public benefits which are critical to the Hollywood Community.

2	<u>New Historic Preservation Overlay Zones</u>	CRA surveys over the years identified specific historic residential districts. These CRA districts should be reflected as potential HPOZ areas in Community Plan mapping and the EIR. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.
3	<u>Historic Cultural Monuments</u>	The Hollywood Community Plan adoption by the City Council in 1986 required that roughly 100 National Register and other listed historic buildings be forwarded by CRA to the Cultural Heritage Commission for listing as HCM's at the City, and for notification of the CHC in the event of proposed demolitions. CRA met its obligation and City Planning did not implement. The EIR must reflect this current non-compliance. The City agreed in 2009 again in a formal Settlement Agreement.
4	<u>Mapping of "protected" historic buildings, and notification of planned demolitions:</u>	There is a currently-adopted list of CRA buildings, with Status Codes 1-4 protected by the Hollywood Redevelopment Plan, including recognition of these buildings in EIRs. These addresses must be transferred, mapped, and protected by City Planning and reflected in the EIR. In addition there is an interim procedure set by judicial action wherein Hollywood Heritage is consulted on planned demolitions for Status Codes 1-6 within the Redevelopment Area Update 2020: ARG list uploaded into historicplacesla—Hollywood heritage has done a parcel by parcel check and mapped in GIS format and produced the "511 List" in Excel spread sheet format..
5	<u>Interim Control Ordinance immediately:</u>	The Hollywood Boulevard National Register Commercial and Entertainment Historic District will need an ICO to give the Planning Department time to follow up on the court-mandated CRA Urban Design Plan, and to work to conform the zoning categories with current protections. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.
6	<u>Prohibition of Demolition</u>	Step two

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.

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:

- I. 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.

1. 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.

ATTACHMENT #5

Draft Hollywood Community Plan

Update 2018

Update 2020

Hollywood Heritage

Response to Draft Plan and Draft EIR

HPCU Goals for Preservation, and HHI Review of Proposed Implementation

Hollywood Heritage Inc
Updated Jan 2019 for review of Nov 2018 Draft
Updated Dec. 2020 in reference to CPIO

Background:

The Hollywood Community Plan Update (HPCU) Draft Plan Text states goals, policies, and implementation projects regarding historic preservation.

- The only mandatory part of a Community Plan is the Land Use Plan. The Land Use category and zoning (density, uses, heights etc.) assigned to each land parcel are the Plan. If the CPIO covering historic preservation is a part of the zoning for certain parcels, it will be mandatory as well.
- The goals, policies, and implementations noted below are aspirational. They are intended to guide Planning and other departments in their future priorities and discretionary actions.
- If a goal or policy is not carried through now in the zoning that is proposed to be adopted, then for now that goal or priority is not being carried out as a part of the adoption of this proposed Community Plan. It is being recommended for the future.
- The HPCU Plan Text issued November 2018 replicates most of the proposals from 2017. Hollywood Heritage circulated our review at that time. The document was again revised in August 2020

D. Goals stated– Plan summary says HPCU “promotes preservation”—the CPIO is what can make this true

- “Expands historic resources protection in Hollywood” -
- “Supports the establishment and expansion of historic districts, including expansion of the Melrose Hill Historic District
- “Links the use of incentives to historic preservation, and requires conformance with the Secretary of the Interior Standards

E. 2017/8 Draft Preservation Element Text- Goals, Policies, and Implementation (Update 2020)

Goal P.1: Honor Hollywood’s legacy through the preservation of the built environment that reflects Hollywood’s cultural, social, economic, and architectural history.				
	Policy	Implementation – listed as Short Term	Timing?	HHI recommends
P 1.1	<u>Significant neighborhoods and districts.</u> Support the preservation of culturally and historically significant neighborhoods and districts.	<ul style="list-style-type: none"> • P28 Current HPOZ protections and new HPOZs - provide rehab guidance to owners • P29: Develop Los Feliz HPOZ • P31: Study expanding Melrose Hill HPOZ • P68: Work with neighborhood councils and preservation organizations to create interpretive programs & signage 	<p>DCP Short term (immediate)</p> <p>Long term (with Council Office etc)</p>	CPIO Prior to Plan Adoption— Include all identified— Extend HPOZ status to all in CRA área Identify budget for HPOZs
P 1.2	<u>Adaptive reuse.</u> Promote the preservation and adaptive reuse of existing building stock, especially for designated or eligible historical resources.	<ul style="list-style-type: none"> • P65: Improve and streamline rehabilitation with “early” advice and guidance from DCP and LADBS 	DCP and LADBS Long term-No specific proposed action	Training sessions on State Historic Building Code etc at LADBS

P 1.3	<p><u>Designated and potentially significant resources.</u> Preserve designated Historic Cultural Resources and further study eligible resources as potentially significant resources.</p>	<ul style="list-style-type: none"> • P38: Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character 	<p>DCP Short term (immediate)</p>	<p>Prior to Plan Adoption—Deal now in CPIO extend CHM protection to all National Register properties (Ken says this is already being done) list all buildings required in 1990 as HCMs now</p>
P 1.4	<p><u>Buildings in FAR Incentive Areas.</u> Protect designated historical buildings, including those which are located within Floor Area Ratio (FAR) Incentive Areas and multi-family residential areas where the Plan restores citywide standard R4 density. (Upzone, incentivize demolition, in order to protect?)</p>	<ul style="list-style-type: none"> • P33. Study the feasibility of TDR Hollywood program • P38: Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character 	<p>DCP Short term (immediate)</p>	<p>Prior to Plan Adoption— Main job of CPIO now is to protect from Plan’s upzoning or reverse upzoning TDR now in CPIO-</p>
P 1.5	<p><u>Distinctive street features.</u> Protect distinctive features of prominent streets in Hollywood, such as the Walk of Fame, a recognized Historic Cultural Monument of the City of Los Angeles.</p>	<ul style="list-style-type: none"> • P34: Maintain Walk of Fame designation, dimensions • P66: Rehabilitation Plan for Walk of Fame • P138: support initiatives like HEART of Hollywood 	<p>DCP/BOE/DOT -Short term (immediate) Acknowledge existing process and procedures, No process or timing proposed</p>	<p>Add significant streetscapes— Cahuenga, etc, as identified by CRA survey</p>
P 1.6	<p><u>Study preservation tools.</u> Support the study of Residential Floor Area (RFA) Special Districts, Community Design Overlays (CDOs), or a Community Plan Implementation Overlay (CPIO) for neighborhoods that retain a cohesive character but are not eligible to become Historic Preservation Overlay Zones.</p>	<p>No policies or implementation provided</p>		<p>Prior to Plan Adoption CPIO— Commit to neighborhood protection for Character Residential and add Multifamily historic protections-- Ivar Hill, Colegrove, Hollywood North Multifamily, , Fountain bungalows, Mansfield-</p>
P 1.7	<p><u>Preserve designated resources.</u> 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</p>	<ul style="list-style-type: none"> • P35: establish zoning regulations to ensure appropriate review of designs for resources 	<p>DCP- Short term (immediate) Is this incorporated for every identified resource in the plan?</p>	<p>Prior to Plan Adoption—CPIO Clearly apply Standards to all identified resources— not just those designated already by City of Los Angeles</p>

P 1.8	<p><u>Complementary design.</u> Encourage the design of new buildings that respect and complement the character of adjacent historical resources through design standards ..such as CDO, CPIO</p>	<ul style="list-style-type: none"> ● P36: Use Citywide Design Guidelines for new and infill development ● P37: Study Rodney/Lyman/Alley for potential historic significance ● P38: Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character 	DCP No process or timing proposed	<p>Prior to Plan Adoption— CRA Redev Plan Sec</p> <p>Hollywood Blvd Urban Design Plans, etc</p> <p>P 36: Require analysis under Preservation Brief #14 .</p>
P 1.9	<p><u>Land use and zoning.</u> Maintain appropriate General Plan Land Use designations and zoning in existing historic districts which are either listed in, or are eligible to be listed in the National Register of Historical Resources. Promote infill development that matches the scale of historical resources within each district, including the following: height, massing, setbacks, stepbacks, and development pattern</p>	<ul style="list-style-type: none"> ● P 39: Study Afton Square, Selma Le Baig, Serrano 	DCP- No process or timing proposed	<p>Prior to Plan Adoption— CPIO</p> <p>Revise all proposed land use designations due to conflicts</p> <p>Hollywood Core Transition by CRA affects Afton Place Hollywood Boulevard most important National Register District</p> <p>Require use of Preservation Brief #14</p> <p>Extend HPOZ protections and procedures immediately</p> <p>Prohibit parcel assembly</p> <p>Strong development limitations and override of TOC in CPIO p 69 and 70-</p>
P 1.10	<p><u>Height limits.</u> Maintain height limitations on commercial zones that border designated or eligible historic neighborhoods. Encourage the design of new buildings that respect and complement the character of adjacent historic neighborhoods.</p>	<ul style="list-style-type: none"> ● P40: Study heights at Sunset and Western 	DCP- No process or timing proposed	<p>Prior to Plan Adoption—</p>
P 1.11	<p><u>Financial resources.</u> Support efforts to identify financial resources for rehabilitation of historical resources. Promote the use of the City's Mills Act</p>	<ul style="list-style-type: none"> ● P67: Partner with HCID to rehabilitate housing 	DCP, HCID No process or timing proposed	

	Historical Property Contract Program, the Federal Historic Rehabilitation Tax Credit, and the California Historical Building Code			
P 1.12	<u>Documentation.</u> Support opportunities to document Hollywood’s history and architectural legacy and share that history with the community.	<ul style="list-style-type: none"> • P41: Support and complete Historic Places LA • P68: Work with neighborhood councils and preservation organizations to create interpretive programs & signage 	DCP- Long term	Prior to Plan Adoption—

Communication from Public

Name: Roberta Edwsrds

Date Submitted: 04/20/2023 11:49 PM

Council File No: 21-0934

Comments for Public Posting: I lived in Hollywood from 1952-1966, attending Le Conte and High school and graduating from Hollywood High School, we lived on Oakcrest Drive off of the Cahuenga Pass: I fully understand the need for more housing, but there are ways to accomplish this without destroying iconic landmarks that people globally come to visit, so many have already been lost, preserving what's left must be a priority if "Hollywood" is to be Hollywood. Most of the Glamour is gone, keep what's left. Regards, Roberta Edwards Redwards3372@Gmail.com Redwards008@dc.rr.com