

Communication from Public

Name: Joseph Scrimshaw

Date Submitted: 05/02/2023 11:50 AM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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 live and work in this neighborhood. The history of the place is a vital part of our future. Please do not destroy our future. Sincerely, Joseph

Communication from Public

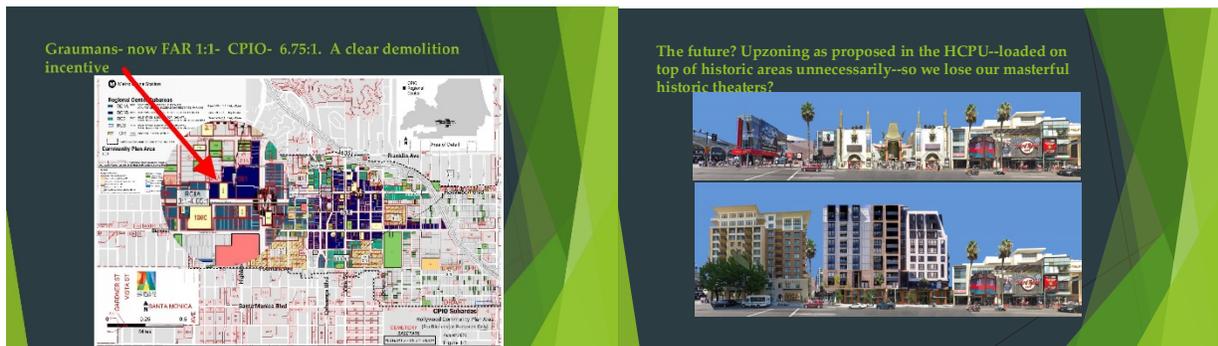
Name: Donna Williams
Date Submitted: 05/02/2023 10:29 AM
Council File No: 21-0934

Comments for Public Posting: I urge you to vote NO on this plan. You should have reviewed by now all of the public records and comments pointing out fatal errors with the Hollywood Community Plan. The Hollywood Community Plan should proceed as written. Repealing the the Hollywood Development Plan and not replacing it with protection for the National and California Registered districts is a crime. Why should Hollywood receive less than the Downtown Community Plan when the second highest number of identified historic resources outside of downtown are located in Hollywood. City Planning should be ashamed of this plan. This is a developer driven plan. I witnessed a full house of developers at the 2020 Community Redevelopment meeting when CD13 supported the measure to exclude the transfer of the Hollywood Design Guidelines from adoption into the plan. You have a responsibility to know what is in the plan and what is not. If you're not asking the questions raised by submissions to the public record and the 100's of public comments you are not doing job. SHAME ON ALL OF YOU.

GET THE BULLSEYE OFF HOLLYWOOD!!!

Honorable Councilmembers:

Despite record letters and public comments saying “don’t approve this Plan”, the Hollywood Community Plan sailed through the PLUM Committee last Monday. PLUM kicked the Plan to you, failing to address many public concerns, and they excluded many people from speaking. Please check the Council file and verify the strong public reaction against this plan.



The Hollywood Community Plan and Update should not proceed as written. Planning has presented you their version of an historic building protection plan that is smoke and mirrors. I urge you to remove the ordinance (Exhibit D) that repeals the Hollywood Redevelopment Plan. Do not let Planning toss more than 35 years of hard earned protection in the trash.

Ask Planning about their replacement plan. It does not exist. Programs and policies are not regulation. In all of their reports and studies, they have not analyzed the impact of the “gap” they create by repealing the current Plan. Other agencies know that Planning very often presents their assumptions as fact, and then claims it has analyzed the impact. Assumption is not analysis.

And because of the “gap” created by Planning, developers will be able to come in and destroy our historic assets by right. What will that do to tourism when there is no more Hollywood to visit? This is why I urge you to reject the ordinance, get the bullseye off Hollywood.

Communication from Public

Name: Howard W Franklin

Date Submitted: 05/02/2023 11:41 AM

Council File No: 21-0934

Comments for Public Posting: I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Hollywood Community Plan Update CF-210934. 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.

Communication from Public

Name: Lisa L Fancher

Date Submitted: 05/02/2023 01:05 PM

Council File No: 21-0934

Comments for Public Posting: Dear City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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, Lisa Fancher
Owner, Frontier Records Sun Valley CA

Communication from Public

Name: Lois DeArmond
Date Submitted: 05/02/2023 01:15 PM
Council File No: 21-0934

Comments for Public Posting: Dear City Council Members; I write again, joining the LA Conservancy, Hollywood Heritage, and The CHC, in opposing the Hollywood Community Plan, as it is currently written. I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. Suggestions for revisions are noted below. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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, Lois DeArmond Lifetime resident of Los Angeles Stake-holder in Hollywood for over 50 years Constituent CD 10

Communication from Public

Name: Casey Maddren

Date Submitted: 05/02/2023 01:26 PM

Council File No: 21-0934

Comments for Public Posting: Members of the Los Angeles City Council, Shortly before and during the recent PLUM hearing, the Councilmembers representing CDs 4, 5 and 13 made numerous requests for changes to the Hollywood Community Plan Update (HCPU), among them a request for further upzoning in Central Hollywood. Since the EIR prepared for the HCPU did not review impacts associated with the requested upzoning, the incorporation of this request into the approved HCPU would be a violation of CEQA. The Council must not incorporate the request for further upzoning into the HCPU prior to approval. Thank you for your time. Casey Maddren

Communication from Public

Name: Richard Abrams
Date Submitted: 05/02/2023 03:39 PM
Council File No: 21-0934
Comments for Public Posting: 05/02/2023: Please add the attached PDF of my comments for Agenda Item 53 (CF # 21-0934) of the Los Angeles City Council meeting scheduled for 05/03/2023. Please note that this PDF is being added on 05/02/2023.

Wednesday, May 3, 2023 City Council Session Item (53) Hollywood Community Plan Update

Richard Abrams <abramsrl@gmail.com>

Tue 5/2/2023 10:40 AM

To: Mayor Karen Bass <karen.bass@lacity.org>; Councilmember Nithya Raman <contactCD4@lacity.org>; councilmember.kevindeleon@lacity.org <councilmember.kevindeleon@lacity.org>; Councilmember Rodriguez <councilmember.rodriguez@lacity.org>; councilmember.blumenfield@lacity.org <councilmember.blumenfield@lacity.org>; councilmember.harris-dawson@lacity.org <councilmember.harris-dawson@lacity.org>; councilmember.mcosker@lacity.org <councilmember.mcosker@lacity.org>; councilmember.soto-martinez@lacity.org <councilmember.soto-martinez@lacity.org>; councilmember.lee@lacity.org <councilmember.lee@lacity.org>; Council Member Krekorian <councilmember.Krekorian@lacity.org>; councilmember.hutt@lacity.org <councilmember.hutt@lacity.org>; councilmember.Price@lacity.org <councilmember.Price@lacity.org>; councilmember.park@lacity.org <councilmember.park@lacity.org>; councilmember.hernandez@lacity.org <councilmember.hernandez@lacity.org>; Hydeefeldstein <hydeefeldstein@yahoo.com>; Clerk.CPS@lacity.org <Clerk.CPS@lacity.org>

 1 attachments (8 MB)

HCP2-1021.pdf;

The attached comments are to be added to the official record on Hollywood Community Plan Update.

According to councilmember Hugo Soto-Martinez, he and CM Yaroslavsky and CM Raman have made major changes to the Update for the Hollywood Community Plan without doing an EIR of any type. Please see my attached memo which discusses the reasons that the Hywd Com Plan may not go forward with major amendments which have been added without any EIR. Sincerely, Rich Abrams

To: Los Angeles City Council, City Attorney, Mayor Karen Bass
From: Richard Lee Abrams, Hollywoodians Encouraging Logical Planning (HELP)
RE: Major Changes to Hollywood Community Plan Update (21-0934) with new EIR
City Council Hearing Date; Wednesday May 3, 2023
Date: Tuesday, May 2, 2023

Synopsis:

Starting in 2016, I have made major comments to the Update to the Hollywood Plan. At the last moment, councilmember Hugo Soto-Martinez (and CM Yaroslavsky and CM Raman) demand major changes to the Update without the public's having an EIR. Thus, the public has no way to know what specific changes they want and the public's role to provide comment after a careful consideration of his proposals has been totally eliminated. Councilmember Hugo Soto-Martinez goes as far as to a demand that the city council approve provisions which have not even been written yet and that the city attorney participate in writing them!

On August 17, 2021, the City gave its Notice of Completion and Availability of the Final Environmental Report. There has been close to two years for these councilmembers to follow the proper CEQA process. They may not wait until the week before the city council's hearing to add major amendments substantially impacting the Plan.

Brief Rendition of the Problem:

On April 21, 2023 councilmember Hugo Soto-Martinez wrote a letter saying he was displeased with the present state of the Update to the Hollywood Community Plan. His six page letter made many material changes to the Update and unless they were incorporated into the Update, he would not vote for it. Copy of April 21, 2023 attached

On April 24, 2023, councilmember Hugo Soto-Martinez orally insisted on major changes to the Update, but we have no copy of his statements. (CEQA does not allow oral modifications of EIRs.)

On April 29, 2023 councilmember Hugo Soto-Martinez placed a memo on the website for CD-13 setting forth more demanded changes for the Update. Copy attached. He stated, inter alia,

Along with Councilmembers Raman and Yaroslavsky, **we successfully added the following amendments to the plan** as it was being considered by the Planning Committee:

- Additional tenant protections, including relocation assistance for renters forced out of their homes and a provision requiring no net loss of affordable housing units for new developments
- The lifespan of affordable housing extended from 55 years to 99 years - the legal maximum.
- Additional affordability requirements in some areas to promote equity and consistency across the plan's jurisdiction.

Councilmember Martinez states he, Yaroslavsky and Raman have made “amendments” to the Update at a PLUM hearing, but he failed to state any CEQA provision which permits major changes without an EIR. Major changes require a new EIR. While the amendments are material, they are also vague making it impossible for the public to assess them. The public has not been provided a reasonable time to address the changes. What does “Additional affordability requirements in some areas to promote equity and consistency across the plan's jurisdiction” even mean? It is clear, however, that whatever Soto-Martinez means by “equity,” his notion of equity will apply to the entire plan, i.e., “across the plan’s jurisdiction.” What could be more material than something which applies to every aspect of the Plan? CEQA does not allow major amendments at the last minute on the whim of a councilmember.

His website then continued:

In addition to incorporating East Hollywood into the plan, we made it clear that **our support for approving it is contingent on the ability to make the following changes after its adoption:**

- Increased affordable housing and density.
 - o Add more affordable housing requirements for new developments.
 - o Rezone to build housing more easily on public land.
 - o Add adaptive reuse provisions so we can convert under-utilized office and commercial buildings into housing.
- Anti-displacement measures
 - o Expand anti-displacement provisions to all areas of the plan instead of only certain neighborhoods.
 - o Define and promote social housing models.
 - o Prevent building demolitions before replacement projects are approved.
- Sustainability and safety
 - o Reduce the car-centric uses in the plan.
 - o Reform parking requirements.
 - o Remove street-widening requirements.
 - o Study earthquake resilience to improve retrofitting.
 - o Additional sustainability measures, including an environmental justice program.

Notice the words, “**our support for approving it is contingent on the ability to make the following changes after its adoption.**” In other words, the Plan must include all these additions, vague and major as they are, into the Plan. CEQA does not allow the Plan to be committed to major changes which will be

drafted **after** it is adopted. If the councilmembers wish to make major changes, they have one legal option – do an EIR.

The City Council agenda for May 3, 2023 makes very clear that the DCP and the City Attorney will make these changes **after** the Plan is adopted. No CEQA provision allows the city attorney to draft provisions **after** it has been adopted.

9. INSTRUCT the DCP, in consultation with the City Attorney, to incorporate the amendments requested by Council Offices 4, 5, and 13 in their communications dated April 4, 2023 and April 21, 2023, and the additional recommendations submitted by Council District 13 at the April 24, 2023 PLUM Committee meeting and amend any of the proposed ordinances as instructed by the PLUM Committee and as necessary, to ensure consistency with the Hollywood Community Plan.

This is legal lunacy. These words mean that if the Update is approved, the DCP and the City Attorney will draft all the material changes which councilmember Hugo Soto-Martinez and Councilmembers Yaroslavsky and Raman desire without any EIR. No one has ever heard of the Plan being written **after** it has been adopted. In other words, the Update will have major provisions drastically altering the Update and the public will be deprived of an EIR. Who ever heard of adopting provisions for A Community Plan which have not even been drafted yet?

Project changes standing alone normally will not trigger requirements for further CEQA review. However, the lead agency must provide a reasoned basis supporting its conclusion that project changes would not result in new or substantially more severe significant impacts. (*American Canyon Cmty United for Responsible Growth v. City of American Canyon* (2006) 154 Cal.App.4th 1062.)

“The City approved the supercenter proposal without requiring supplemental environmental review under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) or a major modification approval or conditional use permit

under its zoning ordinance. ¶ We conclude that the City pre-judicially violated CEQA.” *American Canyon* 154 Cal.App.4th at 1067

Summary:

Councilmember Hugo Soto-Martinez’s actions are so filled with hubristic disregard for the law that it boggles the mind. It rests with the City Attorney to stop this behavior.



HUGO SOTO-MARTINEZ
Councilmember, Thirteenth District

Honorable Members of the City Council
Planning and Land Use Management Committee (PLUM)
% City Clerk, City Hall
200 N Spring St, Room 395
Los Angeles, CA 90012

April 21, 2023

RE: Hollywood Community Plan Update CF# 21-0934

Honorable Members of the PLUM Committee,

Colleagues, it is my enormous privilege to represent such a large swath of Hollywood and East Hollywood, and a pleasure to share responsibility for our community plan area with the Honorable Councilmembers Yaroslavsky and Raman. The bulk of the work undertaken on the Hollywood Community Plan Update (HCPU) predates all of our work as the elected representatives of our districts as this plan has experienced a series of delays due to legal challenges and the COVID-19 pandemic.

As of today I am conditionally supportive of approving this Community Plan Update. For the HCPU before us today I am requesting both the co-presented CPIO changes already mentioned in the letters submitted on behalf of Council Districts 4 and 5 as well as several specific requests for the Regional Center Subareas I represent.

My second condition for support of this Plan is based on the understanding that the work of planning in Council District 13 for Hollywood and East Hollywood cannot and will not stop with this update. During this update process I expect to confirm further commitment of staff and resources to bring forward a more holistic and targeted updated planning effort starting immediately after Council approves the HCPU.

Requested changes to the Community Plan Implementation Overlay (CPIO) co-presented with Council Districts 4 and 5 are as follows:

- **Additional Tenant Protections.** The CPIO should include a more robust set of regulations to protect existing tenants in covenanted units or rented by lower or very low

income households. Such policies should include no net loss of dwelling units, one-to-one replacement of existing affordable units, occupant protections such as the Right to Remain, Relocation, and Right to Return.¹

- **Covenant Terms.** The CPIO should recognize the long term need for affordable housing by extending the minimum required covenant term for CPIO Affordable Housing Projects from 55 to 99 years.²
- **On-site Affordability Requirements.** The CPIO should maintain consistent affordability requirements for both parts of the Corridors Subarea by increasing the On-Site Restricted Affordable Units percentages required for Corridors 2 Subarea CPIO Affordable Housing Projects to match those required for Corridors 1 Subarea.
- **AB 2097.** While the CPIO contains various regulations that provide for parking flexibility for changes of use and other scenarios, due to the implementation of AB 2097 (2022) which prohibits the imposition of parking requirements in many instances the CPIO should be updated to reflect that the City can no longer require parking within a ½ mile of public transportation as defined in the bill. I thank the Department for including in their report a map of areas within the Hollywood Community where AB 2097 applies.³ I further encourage the department of City Planning to add a layer to the City's ZIMAs mapping application to show the citywide boundaries of AB2097 locations in much the same way as it displays applicable Transit Oriented Communities.

Requested changes to the CPIO unique to Council District 13 are as follows:

- **Additional regulations for Hotels.** Currently the plan requires a Conditional Use Permit (CUP) for Hotel projects that require the removal of residential units in the Regional Center subareas (RC1A, RC1B, RC2, RC3). I am asking for a prohibition of new hotels which require the removal of residential units in these areas.⁴
- **Additional Hotel Process.** Additionally I request that a CUP be required for any new hotel in the Regional Center Subareas, consistent with the procedures of Los Angeles Municipal Code Section 12.24.U.⁵ I am also requesting the following findings be made for any Hotel CUP reviewed under this process:
 - That there is sufficient market demand for the Hotel or transient occupancy residential structure project proposed;
 - That the hotel or transient occupancy residential structure project will not unduly and negatively impact demand in the City for affordable housing, public transit, child-care, and other social services, taking into consideration the impact of the

¹ Option 9 & 10, page 10 of the [April 18th City Planning Directors Memo](#).

² Option 8, page 9 of the [April 18th City Planning Directors Memo](#).

³ [AB 2097 Eligible Parcels In Hollywood Community Plan Area](#)

⁴ Option 18, page 13 of the [April 18th City Planning Directors Memo](#).

⁵ Option 17 with modifications, page 13 of the [April 18th City Planning Directors Memo](#).

part-time or seasonal nature of work at the hotel or transient occupancy residential structure project and of project employees' expected compensation;

- That the applicant will take measures to employ residents of neighborhoods adjoining the hotel or transient occupancy residential structure project in order to minimize increased demand for regional transportation and to reduce demand for vehicle trips and vehicle miles traveled;
 - whether the applicant will take measures to encourage hotel workers and guests to use public transportation, cycling and other non-automotive means of transportation.
 - whether the hotel or transient occupancy residential structure project will displace or negatively impact small businesses in the immediate vicinity and whether the applicant will adopt any measures to increase demand for local goods and services.
 - Whether the project will negatively affect the availability of affordable and rent-stabilized housing within the plan area. The project shall not demolish any building in which rent stabilized or restricted affordable housing existed in the last ten years or convert in whole or in part a building in which rent stabilized or restricted affordable housing existed in the last ten years to a hotel or transient occupancy residential structure.
- **Increased Affordability Levels in the Regional Center:** The Regional Center of Hollywood is a jobs rich, transit rich portion of Los Angeles, and it must at the very least incentivize affordability ranges that correspond with that of the higher Transit Oriented Communities Incentives already available in areas with fixed rail stations. I support alignment of TOC Tier 4 affordability levels in the CPIO.⁶
 - **Adjust Base FARS in the Regional Center Subareas.** To promote affordable housing production incentive the analysis provided by H&A Advisors indicates that de facto increases to the RC subarea base FARs will reduce the feasibility of overall production of onsite affordable housing even to below the current TOC requirement levels today. Therefore I request that base FARs in the Regional Center Subareas not be increased as recommended by the City Planning Commission. While I believe that the core of Hollywood would benefit from increased bonus density and I make this recommendation reluctantly, I cannot support FAR increases that would undercut the amount of onsite affordable housing possible for market rate projects until such time as incentive based affordable housing programs are replaced by mandatory inclusionary programs.⁷
 - **Reinforce Non-residential Public Benefit Incentives.** I support the recommendations to increase the required benefits offered by non residential projects, among them increased linkage fees, and increased publicly accessible open space.⁸

⁶ Option 12, page 10 of the [April 18th City Planning Directors Memo](#).

⁷ Option 3 & 11 page 6 & 10 of the [April 18th City Planning Directors Memo](#)

⁸ Option 6 & 7 page 8 & 9 of the [April 18th City Planning Directors Memo](#).

- **Amend the CPIO Historic Eligibility.** amend the CPIO to include survey eligible parcels with the California Historical Resources Status Code of 5S3 to the list of historic resources.⁹
- **Include Enhanced Demolition Review Procedures for National Register District.**¹⁰

Requested Additional Council District 13 Planning Tasks for Hollywood and East Hollywood Beyond the Hollywood Community Plan Update:

The work of planning is not a static work product, but an ongoing effort which can never be finished. The urgency to finish all 35 Community Plan Updates is related to the fact that land use policies need regular updates. Many of our plans are decades older than they should be. The Hollywood Community Plan Update does improve on the 1988 Plan, but it does not finish the essential work I believe is required for Hollywood and East Hollywood. Additional work needs to be done to accelerate the production of higher densities of housing, particularly affordable housing, prevent displacement and gentrification, and increase sustainability. Further, this work must be done collaboratively with the diverse communities of CD13.

Critically, this Hollywood Community Plan Update made no fundamental changes in East Hollywood- the area of the Hollywood Community Plan which has the lowest income populations. Within the HCPU there are expanded zoning protections in the CPIO for tenants particularly if PLUM makes the changes recommended in our Council letters, yet East Hollywood renters have no access to those protections as they are not included in the CPIO areas. Without any additional protections in East Hollywood, displacement will continue to occur.

I also believe that the overall density in the Hollywood Regional Center is too low. The HCPU caps available bonus Floor Area Ratios around 6.75:1. I strongly support increasing both the base and bonus FAR for Hollywood- when additional provisions for onsite affordable housing requirements can be made. Hollywood is a jobs and transit rich area, one which is globally famous. We must do more to promote economic growth and ensure through our land use and zoning that it is a thriving and just area for residents, workers and visitors.

I am prepared to vote in support of this plan only with the public assurance that the Planning Department will allocate resources for a targeted zoning and land use update within CD13 in the Hollywood and East Hollywood areas directly following the adoption of the HCPU. The residents of my district cannot wait another 40 years for this work.

I thank Mayor Karen Bass for her strong support as demonstrated by Exhibit H of the Mayor's Proposed 2023-2024 Budget.¹¹ I am seeking that same support at the Planning and Land Use Management Committee hearing and a public verbal affirmation from Director Bertoni that he will put his most experienced available community planners, hopefully including staff who have

⁹ Option 4, page 7 of the [April 18th City Planning Directors Memo](#).

¹⁰ Option 5, page 7 of the [April 18th City Planning Directors Memo](#).

¹¹ Exhibit H, #6, PDF page 53 of the [Mayor's Proposed 2023-2024 Budget](#)

worked on high density recent plan areas to work as soon as the Hollywood Community Plan Update passes City Council.

My working vision for the required scope of the changes is as follows:

Affordable Housing Production:

- Increase the housing and jobs growth objectives and densities for the core of Hollywood and East Hollywood, including using any and all tools developed under the Re:code program.
- Add a mandatory onsite affordable housing program to all housing projects in the update area, while providing by right cost offsets such as waiver of linkage fees, reduction in parking requirements and increased project streamlining for both CEQA and discretionary approvals to support the production of housing.
- Re-define the land use for publicly owned land so that public sites are free to develop housing by-right at the highest densities available in the City to spur faster production of affordable housing at City owned properties.
- Add a rolling date Adaptive Reuse Ordinance to Hollywood which will allow for the conversion of underutilized office and commercial space to housing, a program which was immensely successful in preserving historic buildings and adding new residents to Downtown.

Anti Displacement Focus:

- Focus on the Vermont/Western Station Neighborhood Area Plan (SNAP) to add targeted anti displacement provisions which match or supersede those offered in the CPIO to prevent the loss of existing affordable housing.
- Define and promote the use of alternative housing models in the plan- such as social housing, land trusts, co-op housing and limited equity cooperatives.
- Expand targeted demolition controls to prevent the loss of tenants and historic resources before projects are approved.

Community Engagement and Benefits:

- Fully analyze the effects of the SNAP with community leaders, revise or adapt the SNAP where it's not working as intended.
- Develop a robust Community Benefits program to increase value capture on non-residential projects and support investment in community priorities when new development is generated under the updated land uses.

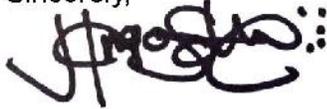
Sustainability & Safety:

- Reduce and disincentivize future car-centric uses.
- Incorporate transit measures for workers in new large scale employment uses.
- Waive street widenings administratively, and automate for affordable housing projects.
- Study the earthquake resilience in Hollywood, and consider setting more restrictive requirements on new buildings within the area to ensure they do not fail in major earthquakes.

- Require additional sustainability measures in large projects.
- Undertake additional environmental justice measures.

I thank the staff at the Department of City Planning for their work in preparing this and all our Community Plans and General Plan Framework Elements and look forward to working with them and this committee on furthering our shared goals for Hollywood.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hugo Soto-Martinez', with a stylized flourish at the end.

Hugo Soto-Martinez
Los Angeles City Councilmember, 13th District

CC: Vince Bertoni, Director, Los Angeles City Planning Department
Craig Weber, Principal City Planner, Los Angeles City Planning Department
Priya Mehendale, Senior City Planner, Los Angeles City Planning Department
Honorable Councilmember Raman, Los Angeles City Council, 4th District
Honorable Councilmember Yaroslavsky, Los Angeles City Council, 5th District

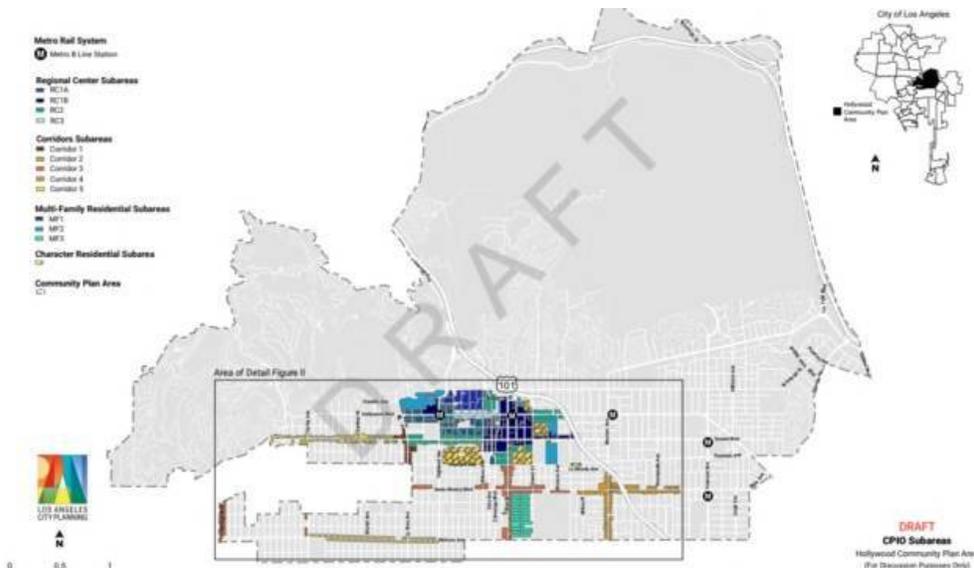


Home > News

> Updating Hollywood's zoning for the first time in 35 years

Updating Hollywood's zoning for the first time in 35 years

Posted on 04/29/2023



ONE BIG THING: THE HOLLYWOOD COMMUNITY PLAN

What is the Hollywood Community Plan?

The Hollywood Community Plan helps determine how the city approaches growth in Hollywood and the surrounding areas.

That means defining policies about:

- The process of building housing

- What protections renters have
- Zoning policies – what type of housing we're allowed to build, and where we can build it.
- Sustainability
- And more

Why it matters

The Hollywood Community Plan **hasn't been updated since 1988, 35 years ago.**

So much has changed in Hollywood since 1988, so it's absolutely critical that we update our policies around housing, zoning, and renter protections so that we aren't stuck in the past.

A problem with the proposed plan

East Hollywood, a predominantly working class community of color, wasn't included **at all** in the current plan. That's why we want to expand tenant protections, anti-displacement measures, and affordable housing to East Hollywood and the communities east of the 101. Because people can pay lip service to equity all they want. But this is how we achieve it.

What are we doing now?

Along with Councilmembers Raman and Yaroslavsky, we successfully added the following amendments to the plan as it was being considered by the Planning Committee:

- Additional tenant protections, including relocation assistance for renters forced out of their homes and a provision requiring no net loss of affordable housing units for new developments.
- The lifespan of affordable housing extended from 55 years to 99 years – the legal maximum.
- Additional affordability requirements in some areas to promote equity and consistency across the plan's jurisdiction.

What comes next?

In addition to incorporating East Hollywood into the plan, we made it clear that our support for approving it is contingent on the ability to make the following changes after its adoption:

- Increased affordable housing **and** density.
 - Add more affordable housing requirements for new developments.
 - Rezone to build housing more easily on public land.
 - Add adaptive reuse provisions so we can convert underutilized office and commercial buildings into housing.
- Anti-displacement measures
 - Expand anti-displacement provisions to all areas of the plan instead of only certain neighborhoods.
 - Define and promote social housing models.
 - Prevent building demolitions before replacement projects are approved.
- Sustainability and safety
 - Reduce the car-centric uses in the plan.
 - Reform parking requirements.
 - Remove street-widening requirements.
 - Study earthquake resilience to improve retrofitting.
 - Additional sustainability measures, including an environmental justice program.

Check out our [infographics](#) and [video](#) explaining the plan!

Two More Quick Hits!

Check out our weekly recap video on [Twitter](#), [Instagram](#), and [Facebook](#)!

1. Solidarity with Armenians in Artsakh on Armenian Genocide Remembrance Day

This past Monday on Armenian Genocide Remembrance Day, our entire office joined community leaders in Little Armenia to remember the 1.5 million Armenians killed during the genocide, and to show solidarity with the 120,000 Armenians in Artsakh, including 30,000 children and 20,000 elderly, continue to live under a blockade that has gone on for over four months now.

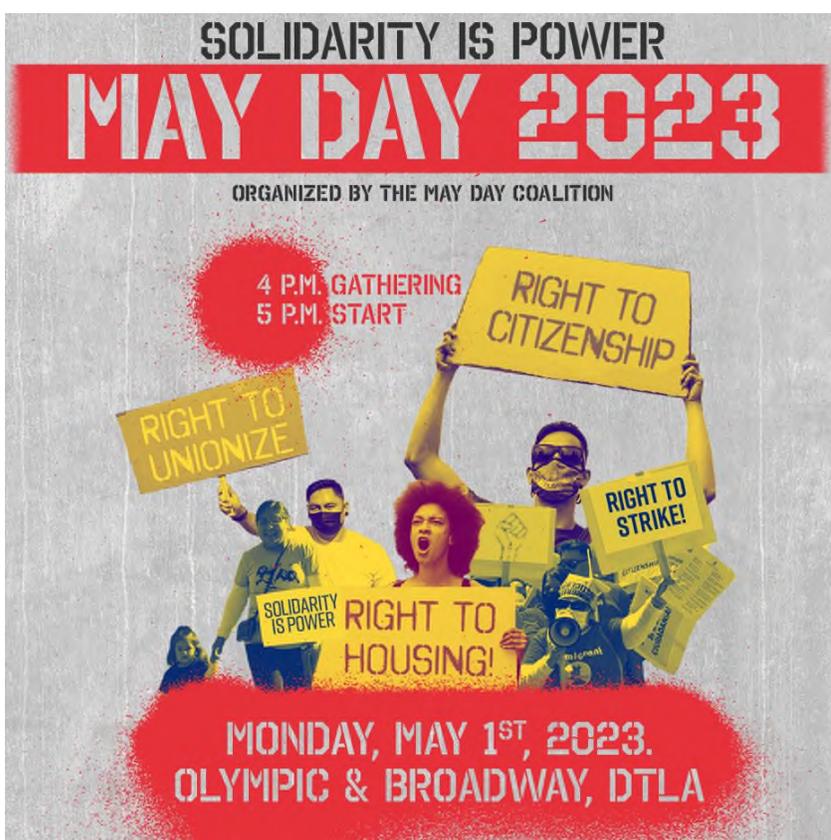
We must make it clear that these inhumane actions and ethnic cleansing campaigns have no place in our world.

2. Join us Monday at 4pm for the May Day March!

May Day is coming up on Monday, May 1st, and we want as many folks as possible to join us in this year's march at Broadway & Olympic in DTLA to stand up for:

- 👊 The Right to Unionize
- 👊 The Right to Strike
- 👊 The Right to Housing
- 👊 The Right to Citizenship

[RSVP Here!](#)



CD13 In The News

[LA DAILY NEWS - LA City Council seeks 'a more inclusive, sustainable Hollywood' in community plan](#) - "The uneven growth and increasing inequality across Hollywood in the 35 years since the last Hollywood Community Plan update has shown the desperate need for more equitable density," Soto-Martínez said. "We have the opportunity here to set the roadmap for a more inclusive,

sustainable Hollywood with the affordable housing that we need.”

LAIST – Plans Move Forward To Allow 135K New Housing Units In Downtown LA And Hollywood

– The neighborhood’s existing community plan has not been successfully updated since 1988. Committee chair Marqueece Harris-Dawson joked, “I was watching Batman at Grauman’s theater, the one with Jack Nicholson, when this plan was passed.”

LA SENTINEL – L.A. City Reparations Commission Hosts First In-Person Event

– Created by the city in 2021, the Commission will engage public input and academic and participatory research to develop a future reparations program for a group of Black Angelenos.

LARCHMONT BUZZ – Larchmont Village Neighborhood Spring Block Party This Saturday

– Residents of Larchmont Village are planning a neighborhood block party this Saturday from noon to 5 p.m. on Bronson Avenue.

One Last Thing

DWP Electrical Pole Maintenance

In 2021, two people were tragically killed by a downed power line in Los Angeles. In order to ensure this doesn’t happen again, LADWP has identified 795 poles across the city that are in need of repair over the next 3-4 weeks. This week, DWP dropped leaflets and door hangers at all affected properties notifying of planned maintenance coming soon.

LADWP identified just 24 poles in CD13 that are in need of repair, and a map of those poles is below. If you live, work or travel in any of these areas, beware of ongoing maintenance, and **remember to never touch a downed or dangling wire**. Instead, call 911 if you see one so the situation can be handled safely.

Communication from Public

Name: Hollywood Chamber of Commerce
Date Submitted: 05/02/2023 04:02 PM
Council File No: 21-0934
Comments for Public Posting: Please see attached letter from Hollywood Chamber of Commerce regarding Hollywood Community Plan Update



May 2, 2023
Via Council File and Email

Honorable Members of the City Council
City of Los Angeles
c/o City Clerk
200 N Spring St, Room 395
Los Angeles, CA 90012

RE: CF# 21-0934; Hollywood Community Plan Update

Honorable Members of the City Council:

We thank you for the opportunity to provide feedback on the proposed Hollywood Community Plan Update (HCPU) and Community Plan Implementation Overlay (CPIO). Since 1921, the Hollywood Chamber of Commerce (Chamber) has been committed not just to ensuring that commerce thrives in our community, but to ensuring Hollywood's cultural and civic well-being.

The HCPU and CPIO are critical planning documents that will shape the future of Hollywood. We are writing today because we are deeply concerned that some of the substantial last-minute revisions to the HCPU and CPIO proposed at the Planning and Land Use Management Committee (PLUM) last week are provided with no assessment of their potential economic impact. For the reasons explained below, we believe that some of these changes will lead to reduced financial investment in the community and substantial underproduction of housing units of all types, including affordable housing.

On April 22, 2022, the Chamber wrote a letter to the City Planning Commission (CPC) supporting increased Floor Area Ratios (FARs) and residential densities in several "sub-areas" identified for up-zoning in the HCPU. Greater FARs and densities enable higher value developments to be built, which in turn allows new development to better absorb the significant costs of building new affordable housing and providing other community benefits. The suggestions for higher FAR and density were primarily focused on the HCPU's critical Regional Center Subareas, including the RC1B and RC2 designated areas, which are the areas where increased FAR and density have been determined by the City to be most appropriate.

The Chamber's suggested increases in FAR were supported by a peer review analysis of the August 2021 feasibility study prepared by economic consultant HR&A (HR&A Report). HR&A was retained by the City Planning Department to assess the financial feasibility of the CPIO affordable housing incentive program using the "Tier 3" affordable housing requirements in the City's Transit Oriented Communities (TOC) Guidelines, and the commercial incentive requirements of the CPIO requiring the provision of significant public open space. The HR&A Report came to the counterintuitive and, in our respectful view, ultimately incorrect conclusion that providing lower FARs would actually better support the production of more housing and commercial development.

The peer review of the HR&A Report was prepared by renowned expert economic firm Kosmont Companies, dated June 10, 2022 (Kosmont Report). The Kosmont Report found that a proposed base FARs of 3.0 or lower suggested in the HR&A Report (and currently recommended by PLUM) would be inadequate to attract new residential projects and commercial employment projects on most parcels in the Regional Center study area.

The Kosmont Report's conclusion was supported by actual data from comparable land sales and up-to-date information on construction costs as they existed in June 2022 (the Kosmont Report found the land values and costs in the HR&A Report were unrealistically low, which skewed the analysis, in addition to several other errors in the H&RA Report, as set forth in the Kosmont Report). In addition, the Kosmont Report found the proposed incentive programs for commercial projects to obtain additional FAR that require the provision of significant amounts of public open space would render such projects infeasible under the proposed CPIO framework, disincentivizing adding FAR through bonus incentives for commercial developments, *i.e.*, the incentive program for additional commercial FAR would not be used by commercial developers, if any commercial development would occur at all.

The Kosmont Report analysis concluded that the HCPU should provide for an increase in base FAR to 5:1 for commercial office projects with reduced open space requirements and at least 4.5:1 for multi-family residential projects with the Tier 3 TOC Guideline affordable housing requirements, in order to promote new housing and commercial development production. This conclusion is consistent with the feedback the Chamber has received from our real estate professional members, who have uniformly indicated that the Kosmont Report is accurate in its assessments, and, if anything, even more FAR may be needed to account for increased costs and risk associated with new development.

On August 18, 2022, the CPC voted to support increases in FAR to a base of 4.0:1 for the RC1B Regional Center subareas near the Hollywood & Vine Metro Station, with the ability to obtain incentives to go out up to 6.75:1 FAR in that area. Other increases in FAR and density in key HCPU subareas suggested by the Chamber were not recommended by CPC.

On April 21, 2023, just before PLUM heard the matter on April 24, 2023, a letter from Council District 13 proposed significant, last-minute changes to the HCPU, some of which are general recommendations without specified terms. These changes were adopted into PLUM's current recommendation to Council. They include requirements to adopt undefined additional tenant protections and non-residential community benefits, and to make hotels harder to get approved, which add costs and risk to new development.

The April 21, 2023 recommendations also seek to roll back the Regional Center FAR increases proposed by the CPC, taking the base FAR down to 3:1 in the RC1B zone, while also increasing affordable housing requirements to higher Tier 4 TOC Guideline requirements and placing further restrictions on building any new housing where current housing exists, including by eliminating the ability to count "replacement units" required by state laws such as SB 8 and the Density Bonus law toward affordable housing incentives program density bonuses, even though that right is secured by state law.

The proposed changes by CD 13 would thus eliminate the modest FAR increase proposed by CPC, which change would reduce the value of new development, while increasing affordability requirements, which add substantial costs and losses to new development (it is important to realize that affordable housing units are built at a substantial financial loss on a per-unit basis for market-rate housing developers, which is why 100% affordable housing developments must be subsidized to be viable).

The April 21, 2023 recommendations add a third hit to new housing production in particular by extending affordable covenants from the state mandated period of 55 years to 99 years. This change will significantly reduce the Residual Land Values (RLV) for new housing development, which is the measure of value used to incentivize development and obtaining project financing.

These large-scale, last-minute changes that reduce the value of new development while increasing costs were made without any data or analysis of their economic effects. These changes, notably, worsen an economic situation the Kosmont Report found would be infeasible in June 2022 with lesser affordability levels and higher RLVs.

Making the situation even worse, since June of last year when the Kosmont Report was prepared, the costs to purchase and develop real estate have gone up significantly. Among other factors, increased costs have been driven by rising interest rates and, in the City of Los Angeles, a new 4 – 5.5 % transfer tax Ballot Measure ULA has imposed for properties with a *gross* cost of over \$5 million, which went into effect just a month ago. ULA has already resulted in a net decrease in property values citywide of 10-12 percent and has also reduced the volume of real estate transactions significantly.

Making housing and commercial development less valuable and significantly more expensive is not, in our view, a viable strategy to promote investment in the community, particularly amid a housing crisis of historic proportions. The state

estimates we will need 2.5 million new homes by 2030 to keep up with demand, yet as a state we are only building 100,000 new homes each year.¹

Couple these significantly increased costs and reduced values with rising regulatory complexity – the HCPU contributes to an increasingly labyrinthine web of conflicting regulatory incentives and disincentives for new development – and we fear the City is creating a recipe for paltry new housing production and little to no development of job-producing commercial spaces in Hollywood’s critical Regional Center areas and the community as a whole. As it stands, our members are already seeing institutional lenders and major equity sources dry up, as it is becoming increasingly difficult to even explain the process to them, much less to get them to invest millions of dollars at substantial risk.

Our belief is the last-minute changes recommended by PLUM will cause our housing and homelessness crises to get worse. As housing supply stays low, and demand increases, ever greater economic pressure gets put on existing housing units, rents go up, and people are driven onto the streets. New housing production at all levels is needed, as is new commercial development to maintain a healthy jobs-housing balance. Making large changes at the last minute that make new real estate development more expensive and less valuable in the current economic and regulatory climate without studying the economic effects of such a decision is not an approach the City should take.

So, our final recommendation and request is this: if the City will not take the time to study the significant changes proposed by PLUM in detail, they should not be adopted. Rather, the plan as proposed by the CPC should be adopted.

We thank you sincerely for your time and consideration. While the many communities and stakeholders that call Hollywood home may not always agree on the approach, we know that all parties involved have the best interests of Hollywood at heart and want to see our community thrive. Our primary interest as a Chamber of Commerce is in ensuring the jobs and housing our community needs to thrive are properly incentivized and actually come to fruition. We believe strongly based on an extensive member knowledge base that the CPC’s proposed HCPU and CPIO do a better job of that, though we believe even more could and should be done to promote new real estate development, particularly in areas of Hollywood identified by the HCPU for new housing and jobs production.

Sincerely,



Steve Nissen, President & CEO
Hollywood Chamber of Commerce

cc. Honorable Mayor Karen Bass (mayor.helpdesk@lacity.org)
Honorable Council President, Paul Kerkorian (councilmember.Kerkorian@lacity.org)
Honorable Council President Pro Tem, Curren Price (councilmember.price@lacity.org)
Honorable Council Member Eunisses Hernandez (councilmember.hernandez@lacity.org)
Honorable Council Member Bob Blumenfield (councilmember.blumenfield@lacity.org)
Honorable Council Member Nithya Raman (contactCD4@lacity.org)
Honorable Council Member Katy Yaroslavsky (councilmember.yaroslavsky@lacity.org)
Honorable Council Member Monica Rodriguez (councilmember.rodriguez@lacity.org)
Honorable Council Member Marqueece Harris-Dawson (councilmember.harrisdawson@lacity.org)
Honorable Council Member Heather Hutt (cd10@lacity.org)
Honorable Council Member Traci Park (councilmember.park@lacity.org)
Honorable Council Member John Lee (councilmember.Lee@lacity.org)
Honorable Council Member Hugo Soto-Martinez (councilmember.soto-martinez@lacity.org)
Honorable Council Member Kevin de León (councilmember.kevindeleon@lacity.org)
Honorable Council Member Tim McOsker (councilmember.mcosker@lacity.org)

¹ See The California Department of Housing and Community Development (HCD), 2022 Statewide Housing Plan.

Communication from Public

Name: Ronald Telkes

Date Submitted: 05/02/2023 04:07 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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. The legacy of Hollywood is known throughout the world. Hollywood is not just an image or to some people a dream, it is a neighborhood made up of people and physical buildings. Many of the buildings - restaurants, hotels, theaters, businesses and residents are historical and should be retained for generations to come. The local citizens, tourists, government officials and military service personnel come to Hollywood to live, work, and play. They pay taxes which helps

maintain this great neighborhood. A very large portion of these people love Hollywood for the historical nature and preserved historical structures are an important part of it. These historical structures have an impact on the synergy that permeates throughout and brings great benefits, not only to Hollywood, but to the City of Los Angeles, the State of California, and to the United States overall. Please approve the proposed alterations to the Plan as presented by the Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission and, if necessary, postpone this misguided Plan as it stands and take time to reconsider all that will be lost. Sincerely, Ronald Telkes

Communication from Public

Name:

Date Submitted: 05/02/2023 04:10 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: We hope that you will have made plans to accommodate the many citizens who turn out to speak at this meeting. The April 24 PLUM meeting was an unfortunate debacle since the room was filled with people (who were likely paid to be in the room) who were only there to speak on downtown's Plan. I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM. 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,

Communication from Public

Name:

Date Submitted: 05/02/2023 04:27 PM

Council File No: 21-0934

Comments for Public Posting: Dear lovely Person with the City of L.A., I hope you're having a good day. I am writing to urge that the process of updating the Hollywood Community Plan be delayed. Please make sure that you do not pass any update which will endanger our most precious and essential historic and cultural resources. As the LA Conservancy puts it, please do the following: "Expand the definition of eligible historic resources to include and protect properties significant at the local level (those classified as 5S3). Apply the full range of Historic Preservation Overlay Zone (HPOZ) preservation protections, procedures and existing tools to the Hollywood National Register Historic District. " There is a high likelihood that I would have supported their third request too, if the people living in East Hollywood are in agreement - I just don't have any information on that. Further, I do not believe that any further upzoning is necessary, and I oppose increased "giveaways" to developers. If you just give them the extra rights, they will be that much less likely to include affordable units, won't they? Also, merely replacing the number of affordable units doesn't seem like much to ask - why are you not requiring an *increase?* As for increased density itself, let's face facts - people aren't using the train system like they used to. In fact, the decrease began before covid, iirc. (I have never understood *why* it decreased back then.) If you want to increase ridership, make it safer and cleaner, and make it easy and affordable to park and ride. I don't think that doing these things will help that much - but they can't hurt. Why not try it? Maybe even plant some trees. Thanks for listening.

Communication from Public

Name: Stop Selling Out Affordable and Historic Hollywood To Developers!

Date Submitted: 05/02/2023 04:38 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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. Do not sell out Hollywood's Historic Resources to DEVELOPERS who, at the Planning Commission hearings in Feb. and March 2021, pushed for, and GOT mega upzoning "beyond planning staff recommendations' in the Regional Center, that threatens Historic Resources AND prohibits affordable being built there since as the Planning Commission Chair stated : "upzoning increases land value and

land there is already expensive..how will we get affordable built there?" The Planning Commission Chair requested Feasibility Study was presented at the March 2021 HCP hearing and it CONFIRMED that the mega DEVELOPER PUSHED UPZONING WOULD PROHIBIT AFFORDABLE BEING BUILT IN THE REGIONAL CENTER, but they must have been pressured by developer puppet density hawk, Mayor Garcetti and the powerful developer members and The Hollywood Chamber, because, in spite of the worst affordability, and humanitarian homeless crisis in the country, the Garcetti appointed commissioners voted FOR the mega upzoning in the Regional Center that PROHIBITS AFFORDABLE BEING BUILT and THREATENS HOLLYWOOD HISTORIC RESOURCES. Not all, but enough for it to pass. Commissioners, and City Councilmembers that support that DEVELOPER PUSHED mega upzoning in The Regional Center, have been, and are, contributing to the worst homeless and affordable crisis in the country, cow towing to developers, and funded by them. They have NO SHAME. These crisis in The Regional Center will NEVER be solved.

Communication from Public

Name: Nyla Arslanian

Date Submitted: 05/02/2023 04:45 PM

Council File No: 21-0934

Comments for Public Posting: Dear Los Angeles City Councilmembers, The Hollywood Community Plan under consideration is long past due. I have personally provided both written and verbal testimony over the past 10 years. It's time that Hollywood has a plan—but it must be a plan that protects and not destroys the character and relevance of Los Angeles' most important asset. Great care must be taken to ensure that future development does not extinguish the past. Of utmost significance is the Hollywood Boulevard corridor that was named a historic district on the National Register. Any erosion to that district would be a catastrophic loss. There is more to Hollywood than its famous sign. Hollywood is challenging as it is not only a prime residential neighborhood, it attracts 25 million visitors each year. Hollywood is a draw for its historic significance, its beauty, and its accessibility. We concur with Hollywood Heritage and the Los Angeles Conservancy to:

1. Expand the definition of eligible historic resources to include and protect properties significant at the local level (those classified as 5S3).
2. Apply the full range of Historic Preservation Overlay Zone (HPOZ) preservation protections, procedures, and existing tools to the Hollywood National Register Historic District.

An extensive survey of Hollywood's historic resources was completed under the auspices of the Los Angeles Community Redevelopment Agency. Only a small number of these assets have been designated city landmarks, but that does not negate their historic relevance. Indeed, the entire Hollywood Plan area, and, in particular, central Hollywood, dating back more than one hundred years, is significant. We urge your careful consideration of the Hollywood Community Plan and heed the recommendations and concerns of Los Angeles Conservancy, Hollywood Heritage, Inc., and the city's Cultural Heritage Commission and not approve this without the safeguards noted above. It is best to NOT APPROVE—extend the deadline to protect Hollywood, safeguard its cultural relevance and allow serious oversights to be reconciled. Sincerely, Nyla Arslanian, Editor Discover Hollywood Magazine P.S. I am a resident of the Hollywood Plan area.

Communication from Public

Name: Hollywood Resident
Date Submitted: 05/02/2023 05:17 PM
Council File No: 21-0934

Comments for Public Posting: Here we go again! Garcetti's BABY, the illegal, higher density, developer accommodating 2012 Hollywood Community Plan, his last gift to developers funding his political career for years, before he stepped down to run for Mayor, developers that he sold Hollywood out to, had THREE LAWSUITS WON AGAINST IT, and it was thrown out by Judge Goodman. Who, in his ruling said "Hollywood Infrastructure CANNOT withstand the kind of Density YOU want there" This HCP is WORSE! Where are the INFRASTRUCTURE improvements TO WITHSTAND the kind of DENSITY developer corrupt politicians want in Hollywood? I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. Is THIS Plan even LEGAL? Since nothing has improved or changed from the 2012 Plan that the Judge referred to? Judge Goodman called the Plan 'fatally flawed' and 'wishful thinking'. The Mayor and his corrupt enablers LIED regarding overblown population numbers to justify the DENSITY they wanted in Hollywood. Some hauled in by the FBI for DEVELOPER CORRUPTION, awaiting trial, served time, for developer 'pay to play' corruption, RICO, money laundering, bribery.. Great track record on City Council... And still, they arrogantly are selling out Hollywood to developers AGAIN! This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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. Do not sell out Hollywood's Historic Resources to DEVELOPERS who, at the Planning Commission hearings in Feb. and March 2021, pushed for, and GOT mega upzoning "beyond planning staff recommendations' in the Regional Center, that threatens Historic Resources AND prohibits affordable being built there since as the Planning Commission Chair stated : "Upzoning increases land value and land there is already expensive..how will we get affordable built there?" The Planning Commission Chair requested Feasibility Study was presented at the March 2021 HCP hearing and it CONFIRMED that the mega DEVELOPER PUSHED UPZONING WOULD PROHIBIT AFFORDABLE BEING BUILT IN THE REGIONAL CENTER, but they must have been pressured by developer puppet density hawk, Mayor Garcetti and the powerful developer members and The Hollywood Chamber, because, in spite of the worst affordability, and humanitarian homeless crisis in the country, the Garcetti appointed commissioners voted FOR the mega upzoning in the Regional Center that PROHIBITS AFFORDABLE BEING BUILT and THREATENS HOLLYWOOD HISTORIC RESOURCES. Not all, but enough for it to pass. Commissioners, and City Councilmembers that support that DEVELOPER PUSHED mega upzoning in The Regional Center, have been, and are, contributing to the worst homeless and affordable crisis in the country, turning Hollywood over to developers, and probably funded by them. Have you No Shame? This area has lost record breaking RSOs and affordable housing..throwing families to the streets. Whole affordable neighborhoods and been demoed for luxury housing and hotels. Adding more, even larger developer luxury towers to The Regional Center, is NOT the answer OR the SOLUTION to the worst humanitarian homeless and affordable housing crisis in the country.

Communication from Public

Name: Michael F. Malone
Date Submitted: 05/02/2023 05:25 PM
Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM. 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, Michael F. Malone

Communication from Public

Name: Suzanne England
Date Submitted: 05/02/2023 06:11 PM
Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM. 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, Suzanne England
District 13

Communication from Public

Name: Linda Sollima Doe
Date Submitted: 05/02/2023 07:15 PM
Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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, Linda Sollima Doe 3135 Durand Drive Hollywood, CA 90068

Communication from Public

Name:

Date Submitted: 05/02/2023 07:48 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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, Hollywood Hills Resident

Communication from Public

Name: Theodore Otis

Date Submitted: 05/02/2023 08:06 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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 a 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, Theodore Gerard Otis

Communication from Public

Name: Fix The City

Date Submitted: 05/02/2023 09:56 PM

Council File No: 21-0934

Comments for Public Posting: Please find attached a letter concerning CF 21-0934

FIX THE CITY

To the Council via LACouncilComment.com

To the City Attorney via Email at Hydee.FeldsteinSoto@LACity.Org

TO: CITY COUNCIL, CITY ATTORNEY

FROM: FIX THE CITY

RE: CF 21-0934 HOLLYWOOD COMMUNITY PLAN UPDATE, GENERAL PLAN FRAMEWORK

Case No. CPC-2016-1450-CPU, Environmental No: ENV-2016-1451-EIR; SCH. No. 2016041093

Dear City Council:

This brief note relates to Item 53 on the City Council agenda for May 3, 2023, Council File 21-0934

You are being asked to vote to amend the City's General Plan Framework without study and without a full understanding of the ramifications. You are also being asked to approve the Hollywood Community Plan Update without findings that police, fire and other infrastructure is at the very least, adequate. Your vote on both items contradicts the court's order on these matters.

Simply stated:

- The City can't amend a general plan element without study or analysis.
- Findings and data from 2016 and before are stale and should not be the basis for a 2023 decision.
- The City can't remove mandatory mitigations adopted as part of that general plan element's approval without impact analysis and proof that the mitigation is no longer needed.
- It is disrespectful to the court to try, again, to push through an amendment to the general plan framework that the court has already criticized and politely ordered the City to reconsider after vacating the previous attempt.

The court ordered that it be allowed to review and approve the final Hollywood community plan update prior to the City finalizing it so that the court could confirm that its order was being followed and to allow Fix The City to address any deficiencies related to the court's findings.

This lawlessness must stop. The City needs to obey the rule of law and court orders. It is a travesty that the City has to be reminded of this time and time again.

The City must follow its own directive to provide for adequate infrastructure including, most importantly, first responder capacity.

Your predecessors implemented the mandatory mitigations for a reason: To provide for public safety. Our police department and fire department are understaffed and overworked. Despite their heroic efforts, response times continue to suffer, putting lives and property at risk.

We urge you and the City Attorney to table this vote unless and until the court's instructions and the law are followed.

Sincerely,

Fix The City

www.FixTheCity.Org

Legal@FixTheCity.Org

Communication from Public

Name:

Date Submitted: 05/02/2023 09:56 PM

Council File No: 21-0934

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Communication from Public

Name: Fix The City

Date Submitted: 05/02/2023 09:58 PM

Council File No: 21-0934

Comments for Public Posting: Please find attached the letter previously submitted to PLUM

FIX THE CITY

Via Email: LACouncilComment.com, Councilmember.Yaroslavsky@lacity.org; Dylan.sittig@lacity.org,
Councilmember.Raman@lacity.org, Councilmember.Soto-Martinez@lacity.org;

TO: PLUM COMMITTEE

FROM: FIX THE CITY

RE: CF 21-0934 HOLLYWOOD COMMUNITY PLAN UPDATE, GENERAL PLAN FRAMEWORK

Dear PLUM Committee Members:

Director Bertoni's April 18, 2023 letter to PLUM is yet another example of the City believing it is above the law and need not comply with court orders. The PLUM committee and the council should reject this insult to the courts and to public policy. PLUM and the council should follow the court-proscribed process for complying with the writ issued by the court.

The simple reality is that the proposed Hollywood Community Plan Update (HCPU) fails to address the court's ruling regarding the HCPU in substance as well as with regard to procedure. It is also inconsistent with the General Plan Framework (GPF) including the city's own definition of the policies of the GPF.

To avoid the inconsistency, you are being asked to (again) amend the GPF despite the court's ruling. The original amendment made clear its contempt for the court in its 2014 action (later voided by the court) which stated its purpose as follows:

"This amendment is intended to overrule and supersede the trial court's decision in Fix the City, Inc. v. City of Los Angeles, et al., LASC Case No. BS138580)"

Now, Director Bertoni wishes to try again. He seems to want to re-litigate matters **already brought before and ruled on by the court**. ("As to the Court's reference to Charter Sections 556 and 558 as a basis to find the 2014 FE Amendment is in conflict with City law, that too is in error.") ("Finally, to the extent the court found the 2014 FE Amendment violated the 2014 Judgement and Order because the City did not appeal that decision, the City disagrees."). The city already made that argument to the court – and lost. The city is not above the law.

The attempt to resurrect a motion to improperly amend the GPF will fail again just as it failed before. It is unfortunate that the city and its planning director are attempting to violate the court's orders yet again.

And, from the court's 'Ruling And Order on Matters Submitted', June 24, 2014 it is clear that the court did not look favorably on the city's previous attempt to circumvent the law. The court stated that:

"A "whereas" clause preceding this addition makes clear that Respondents expressly and unequivocally adopted the change to "overrule and supersede" this Court's Judgment and Writ. In addition to ignoring that Respondents failed to appeal from the Judgment in this action filed on February 11, 2014, Respondents appear also to have omitted from their consideration in adopting this questioned resolution certain provisions of the Charter of the City of Los Angeles, requirements of state law-- as well as Respondents' long-standing practice of including monitoring elements in other community plans."

What Director Bertoni fails to tell PLUM is WHY he is trying to amend the GPF. It is because he knows that it was the City that explicitly stated that "Policy 3.3.2...requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services".

In briefs related to the original HCPU, the city acknowledged the mechanism of Police 3.3.2: "What became clear was that a crucial feature of dealing with growth impacts was contained in the General Plan Framework – its program for

timing allowable development with available infrastructure...” The city went further in defending the GPF, stating: “Other alternatives were rejected because there weren’t land use distribution policies or triggering mechanisms to time growth to infrastructure.”

The city also stated that the alternative ultimately selected (GPF) was “particularly helpful because it informed the City that a triggering mechanism should be included so that increases in density **“would not occur until infrastructure and its funding was available.”**

The GPF EIR was clear in its meaning and intent:

2.10 FIRE/EMERGENCY MEDICAL SERVICES

2.10.5 Mitigation Measures

2.10.5.1 Mitigation through Framework Policy

Policies 3.3.2, 7.10.1, 9.17.1, 9.18.1 through 9.18.4, 9.19.1, 9.20.1 through 9.20.3 contained in the General Plan Framework represent measures that would serve to lessen impacts relative to fire/EMS.

Policy 3.3.2 directs monitoring of infrastructure and public service capacities to determine need within each CPA for improvements based upon planning standards. This policy also directs determinations of the level of growth that should correlate with the level of capital, facility, or service improvement that are necessary to accommodate that level of growth. In addition, the policy directs the establishment of programs for infrastructure and public service improvements to accommodate development in areas the General Plan Framework targets for growth. Lastly, the policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services.

Policy 7.10.1 focuses available implementation resources in targeted areas or “communities in need.” Policy 9.17.1 addresses the monitoring and forecasting of demand for existing and future fire facilities and service for the purpose of assuring that every neighborhood would have the necessary level of fire protection service and infrastructure.

There is no doubt as to the nature of the GPF and its mitigations. You can read it above. This is why you are being asked to (improperly) amend the GPF. There simply is a desire by the city to ignore the law, ignore their own self-imposed mitigations and ignore public safety. The city cannot simply wish away the adopted mandatory mitigations.

It is important to note that the court adopted FTC’s arguments concerning increases in density without findings of adequacy:

“Fix the City, in particular, cogently sets forth the reasons (summarized above). The fundamental inconsistency between the Framework and the HCPU on the failure of the HCPU monitoring policy is completely contrary to the Framework’s essential component of continuous monitoring of development activity.) “The [HCPU] is inconsistent with the Framework Element because it does not include any mechanism to ensure that the state of infrastructure will be assessed or to provide for controls on development in the event that infrastructure is insufficient to support the level of development permitted by the [HCPU]”

Further, it seems that the Director is attempting misdirection by stating that the GPF does not require community plans to contain certain monitoring policies or programs. Even if so, which the court found to be false, this does not and would not relieve the city from complying with the mandatory mitigations contained within the GPF itself.

The court stated the requirements for the city with regard to a new HCPU:

“In the event that the RESPONDENT CITY OF LOS ANGELES exercises its discretion to amend the Hollywood Community Plan, its shall do so in a manner that conforms to the policies and objectives of the General Plan of the City of Los Angeles and the requirements of CEQA.”

The court also required that "...legally adequate findings of consistency are made as required pursuant to the Charter of the City of Los Angeles and other applicable laws." There can be no statement of consistency with the GPF absent compliance by the HCPU with those policies labeled as "Mitigation Through Framework Policy."

We also caution that the city cannot approve the EIR until and unless they file a final return with the court which include the proposed documents and provide FTC an opportunity to challenge their sufficiency as a valid return on the writ. This too was ordered by the court after the city had attempted to take unilateral action. The court stated:

"Once a court has made an order that a respondent in an action pending before that court must reconsider, e.g., its community plan and the related EIR, the respondent[s] in such case must submit to that court as part of the Final Return any new community plan and EIR which are prepared." Those "new" documents prepared and submitted in expected compliance with the writ of mandate issued are not effective until that court has "approved" them;"

The court goes on to state:

"There is a clear policy reason why this is so: To apply those limitations to such EIR or other determinations would have the potential of depriving the court at whose order the action was taken of the very jurisdiction it has exercised, and of its continuing jurisdiction --and obligation --to ensure that its orders are *properly* carried out. While a court does not tell an agency how to exercise its discretion, it has the obligation to assure that what is done in response to its writ is lawful and within that discretion."

The court cautioned:

"Underlying the matters before the Court is a fundamental procedural error on the part of Respondents. Once a court has issued its writ of mandate, the entire matter remains subject to the jurisdiction of that court until the court finally reviews and rules on the actions taken by the respondent to comply with the writ."

The City and its counsel are urged to carefully read the GPF, its EIR, FTC's comments on the new HCPU and each of the court's rulings before taking an action that will certainly result in protracted litigation.

In addition to the above, FTC offers the following:

- The City has seen its police force drop to staffing levels that are 1,000 officers fewer than in 2013 – when the FTC case was brought.
- At the same time, the fire department has seen its staffing levels drop and response times worsen.
- New Alquist-Priolo maps have issued since the EIR which need new study.
- 1. There is a defined process for general plan amendments. The proposed GPF amendment does not appear to have complied with LAMC 11.5.6.
- The procedures used to determine RSO affordable replacements can result in a loss of affordable housing as developers are not required to replace RSO units prior to counting affordable units. This is unacceptable.
- The EIR project description does not contain sufficient detail with regard to the amendment of the GPF and no study was done on the amendment.
- To remove a mandatory mitigation measure in a certified EIR requires a showing that the mitigation is no longer necessary. No evidence has been provided to reach that conclusion. See the NOD, SOC and Certification for the Framework Element by the Council in 2001.

FIX THE CITY

- Limiting attachments to 5MB is an infringement on first amendment rights to submit substantial evidence to support our argument that infrastructure and city services are inadequate. With only 24 hours' notice, timely delivery of our submissions is impossible.

By virtue of its own adopted mitigations, prior to adopting increases in allowable density, the city must, through substantial evidence, make findings that the infrastructure in general and specifically public safety infrastructure is adequate. It is not the public's responsibility to prove inadequacy.

We urge you and the rest of the city to abide by the court's orders. We urge you to understand the reason behind the GPF's critical mitigations: To provide for public safety.

Sincerely,

Fix The City, Inc.

Legal@FixTheCity.Org

Communication from Public

Name: Nancy Girten

Date Submitted: 05/02/2023 10:17 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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, Nancy Girten
3061 N. Beachwood Dr. LA 90068

Communication from Public

Name: Richard Davis

Date Submitted: 05/02/2023 10:19 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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, Richard Davis

Communication from Public

Name: Jaci Rohr

Date Submitted: 05/02/2023 10:38 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I work in Hollywood & am a proud member of the entertainment community that reveres the historic character of the area. I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. This Hollywood Community Plan should not proceed. Council can extend the deadline. Unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM . 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, Jaci Rohr

Communication from Public

Name: Frances Offenhauser
Date Submitted: 05/02/2023 11:01 PM
Council File No: 21-0934
Comments for Public Posting: Attached is my request for the back-up for statement by City Planner Weber at the PLUM meeting April 24. 2023

REQUEST TO CITY PLANNING RE STATEMENT AT PLUM: from Fran Offenhauser

PLUM Chair Harris Dawson asked Planning about the public comment and CHC’s recommendations at roughly 1:39.55 in the hearing April 24, 2023. Craig Weber responded “they are all incorporated in the Technical Memorandum”. Following is the CHC Letter, and following is my request for clarification of where the Plan revisions for each item in the Technical Memorandum is located. They appear to be missing.

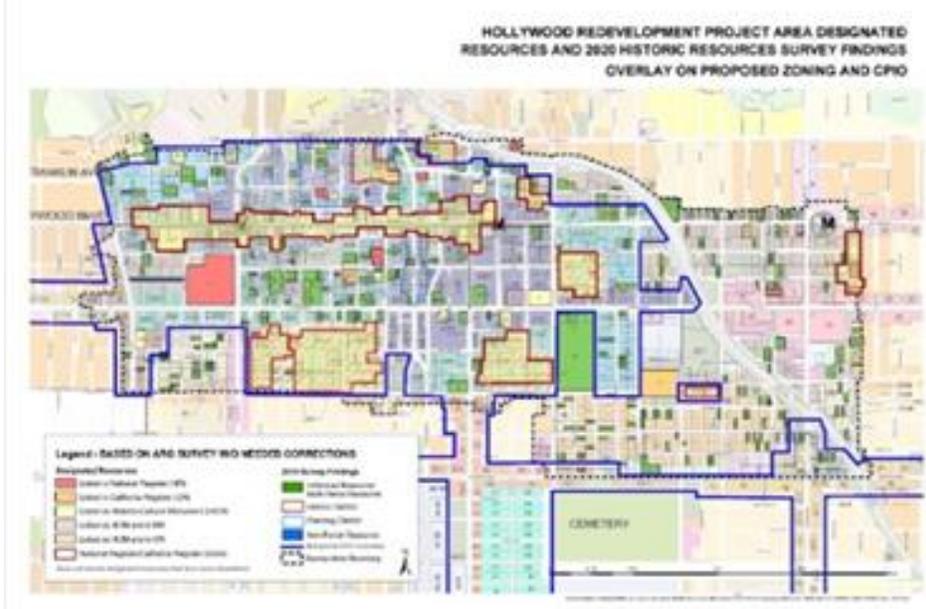
Dear Honorable Members:

HOLLYWOOD COMMUNITY PLAN UPDATE, COUNCIL FILE 21-0934

The Cultural Heritage Commission is sending this communication to express its views on the proposed Hollywood Community Plan Update as presented to the Commission by City Planning staff on May 6, 2021. While it does include regulations that seek to protect historic resources, we feel that additional protections should be incorporated to strengthen the updated plan. As such, we recommend that the City Council adopt the following amendments:

1. Include the identified individually eligible (5S3 status code) historic properties in the Community Plan Implementation Overlay’s (CPIO) definition of Eligible Historic Resources as included in the former Community Redevelopment Area (CRA) plan.
2. Lower the proposed base and bonus FARs on Hollywood Boulevard, within and adjacent to the Hollywood Boulevard Commercial and Entertainment National Register Historic District (District), to further protect the District, and sites such as Grauman’s Chinese Theater and smaller scale commercial courtyards. Additional FAR and density can be accommodated along Sunset Boulevard without impacting the District.
3. Provide further protections for contributing historic resources in the National Register Historic District by applying the demolition review provisions of the Draft Downtown CPIO (Chapter V) to Hollywood. Additionally, on non-contributing properties in the District, require within the Hollywood CPIO that new infill development not conforming with the Secretary of the Interior’s Standards for Rehabilitation (Standards) be approved by the Director of Planning; infill development that does conform with the Standards would receive administrative, ministerial approval.
4. In order to address the bungalow court as a building type worthy of special consideration when demolition is proposed, utilize the 2010 and 2020 Hollywood Redevelopment Project Area historic resource surveys to identify bungalow courts that should receive additional preservation review, and extend the Hollywood CPIO into the Station Neighborhood Area

ITEM 1: What page of the April 18 Technical Memo has the 5s3’s put into the CPIO boundary for protection without bonuses? The 5S3’s that still stand—remaining from 2010 and 2020 surveys after over 100 demolitions—appear to have been carefully removed from the CPIO boundary sometime in 2020. On what page of the Technical Memo are they put back in to fulfill CHC’s request?



ITEM 2. What page in the Technical Memorandum shows the lowered base and bonus FARs around Hollywood Boulevard? The HCPU strips these parcels' D conditions, environmental protections, and redevelopment protections. Where was Grauman's changed from the 3:1 base FAR and 6.75 incentive FAR in the Technical Memo, to implement the CHC 2nd point? And the rest of Hollywood Boulevard? Does the Technical Memo correct the error in the CPIO of defining the National Register District as only in the RC3 area- reducing it to 1/3 its length?



ITEM 2: What page of the Technical Memorandum ensures discretionary review for new infill buildings in the District where non-contributors are? The CPIO defines non-contributors as "ineligible." HHI thought agreement and understanding was reached with DCP that all buildings that are within the NR and CR District boundaries – even some restored former non-contributors—are potentially contributors and are important to the District balance, so "fixing" your "eligible" definition to stop excluding non-contributors was crucial. CHC thought at the very least infill replacing them should be compatible, as that is what the Standards require. HPOZs for local landmarks have these requirements, so CHC expected equity.



ITEM 3. The April 18 Technical Memo includes an excerpted item allowing demolitions of NR buildings; this may or may not be the clause the CHC was expecting to see. A more relevant item from the Downtown Plan is "CPIO Approval Compliance. No demolition permit shall be issued for any Project unless building permits for a replacement development on the site have been issued, and any necessary land use entitlements have been granted. a. Notwithstanding the above this prohibition shall not apply to any structure deemed hazardous by the Department of Building and Safety. b. Furthermore, this prohibition shall not apply to structures that are considered uninhabitable"

ITEM 4 What page of the Technical Memorandum ensures CRA and Survey LA-identified bungalow courts have "special protection?" The Serrano District is known—where are these all cited? Was the CPIO extended eastward as requested? Were any D and Q conditions restored in the bungalow court areas of East Hollywood to discourage demolition? Are new protections added into the CPIO for existing buildings? Currently the CPIO only contains design guidelines for the buildings that will replace current historic resources. As far as I can tell, Survey LA-identified properties or bungalow courts have no protection now in LA, and none proposed by this Plan Update to meet CHC requests.

Communication from Public

Name: Sara Scrimshaw

Date Submitted: 05/02/2023 11:38 PM

Council File No: 21-0934

Comments for Public Posting: Dear Members of the City Council: I feel strongly that the Hollywood Community Plan Update CF-210934 recommended by City Planning must be revised. Council can extend the deadline. This Hollywood Community Plan should not proceed unless you will remove your redevelopment plan repeal Ordinance (Exhibit D) and adopt preservation recommendations presented to PLUM. I support Hollywood Heritage, the Los Angeles Conservancy, and the City's own Cultural Heritage Commission's proposed alterations to the Plan. Specific changes 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. Hollywood is both an idea and a place. Tourists visit the place to have a way to connect with the idea. If the remaining historic buildings are allowed to be demolished, there is no reason for tourists to come here versus any other location. Historic buildings can provide irreplaceable business opportunities and an interesting and diverse neighborhood, which is more likely to attract residents, tourists, and businesses. This is a time to define the future of Hollywood - the neighborhood, the place, the destination. If this Plan isn't

amended, it's possible that the locally, nationally, and internationally important neighborhood of Hollywood will be lost forever. You have before you the opportunity to make a difference. Please do so. Sincerely, Sara Scrimshaw