The Final Environmental Impact Report (EIR) on the Hollywood Community Plan was released and made available for public review on August 17, 2021. A copy of the Final EIR is included here. For a full copy of the Final EIR, including the appendices, please visit the Department of City Planning's website at: https://planning4la.org/development-services/eir.

A physical copy of the Final EIR is also available for review by appointment at the City of Los Angeles Department of City Planning at 200 N. Spring Street, Room 667, Los Angeles. Appointments must be made in advance by emailing hollywoodplan@lacity.org.

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August 17, 2021

NOTICE OF COMPLETION AND AVAILABILITY OF A FINAL ENVIRONMENTAL IMPACT REPORT

Hollywood Community Plan Update
City EIR No. ENV-2016-1451-EIR
CPC No. CPC-2016-1450-CPU
State Clearinghouse No. 2016041093

TO: Affected Agencies, Organizations, and Other Interested Parties

PROJECT NAME: Hollywood Community Plan Update

Notice is hereby given that the City of Los Angeles, as the Lead Agency, has completed the Final Environmental Impact Report (FEIR) for the Hollywood Community Plan Update. The FEIR includes a response to comments, modifications and technical refinements to the Proposed Plan, including supplemental analysis, discussion of Appendix G changes, and corrections and additions to the Draft EIR based on input received.

PROJECT LOCATION: The Hollywood Community Plan Area (CPA) is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. The CPA extends roughly south of the Cities of Burbank and Glendale and the Ventura Freeway (State Route 134), west of the Golden State Freeway (Interstate 5), north of Melrose Avenue and south of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including land south of the City of West Hollywood, and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS: Based on the analysis contained in the EIR, the Proposed Plan would result in unavoidable significant environmental impacts with regard to: Air Quality (Air Quality Standard during Construction and Operational Emissions, Non-Attainment Criteria Pollutants, and Sensitive Receptors during Construction, cumulative); Biological Resources (Special Status Species, Riparian Habitat, Wetlands, and Migratory Wildlife, cumulative); Cultural Resources (Historical Resources, cumulative); Noise (Groundborne Vibration/Noise during Construction, Permanent Increase in Ambient Noise – Operational Stationary Noise, and Temporary Increase in Ambient Noise, cumulative); and Public Services (Deterioration of Existing Public Parks and Recreational Facilities, cumulative). Other issues addressed in the EIR include: Aesthetics, Agriculture and Forestry Resources; Geology and Soils; Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Population, Housing and Employment; Transportation and Traffic; and

Utilities and Service Systems. Impacts associated with these topics were determined to be no impact, less than significant, or less than significant with the implementation of mitigation measures.

DOCUMENT REVIEW: A copy of the Final EIR and the appendices referenced in the Final EIR are available for review by appointment at the City of Los Angeles, Los Angeles Department of City Planning Records Management at 221 N. Figueroa Street, Room 1450, Los Angeles. Appointments must be made in advance by email at planning.recordsmgmt@lacity.org or by phone at (213)847-3753. Copies of the Final EIR are also available for review at the following City of Los Angeles Public Library branches:

- **Richard J. Riordan Central Library**
  (630 West 5th St., Los Angeles, 90071)
- **Frances Howard Goldwyn – Hollywood Regional Branch Library**
  (1623 Ivar Ave., Los Angeles, 90028)
- **Los Feliz Branch Library**
  (1874 Hillhurst Ave., Los Angeles, 90027)
- **Cahuenga Branch Library**
  (4591 Santa Monica Blvd., Los Angeles, 90029)
- **John C. Fremont Branch Library**
  (6121 Melrose Ave., Los Angeles, 90038)
- **Will & Ariel Durant Branch Library**
  (7140 Sunset Blvd., Los Angeles, 90046)

For an electronic copy, the Final EIR can be downloaded or reviewed at the Department of City Planning website: https://planning.lacity.org/development-services/eir. Type Hollywood Community Plan Update in the search box located at the top right of the webpage.

The Final EIR will be submitted to the decision-maker for requested certification and action on the Proposed Plan at an upcoming hearing. The hearing date was not scheduled at the time of publication of this notice. Please note comments on the Final EIR are not required to be responded to by the City. If written comments are received, they will be provided to the decision-maker for consideration.

Please direct any further inquiries regarding the Final EIR to:

Mail: City of Los Angeles, Department of City Planning
Hollywood Plan Unit
200 North Spring Street, Room 667
Los Angeles, California 90012

Email: hollywoodplan@lacity.org

LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

FINAL
ENVIRONMENTAL IMPACT REPORT

Hollywood Community Plan Update

Environmental Case: ENV-2016-1451-EIR
State Clearinghouse No.: 2016041093

Project Location: The Hollywood Community Plan Area (CPA) is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. The CPA extends roughly south of the Cities of Burbank and Glendale and the Ventura Freeway (State Highway 134), west of the Golden State Freeway (Interstate 5), north of Melrose Avenue and south of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including land south of the City of West Hollywood, and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

Council District: 4 (Raman), 5 (Koretz), 13 (O'Farrell)

Project Description: The Hollywood Community Plan Update (Project) would guide development for the Hollywood CPA through 2040 and includes amending both the text and the land use map of the Hollywood Community Plan. The Proposed Project would also adopt several resolutions and zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development standards (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan), and adoption of a Hollywood Community Plan Implementation Overlay (CPIO) District. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Terry A. Hayes Associates Inc.

August 2021

HOLLYWOOD COMMUNITY PLAN UPDATE

FINAL
ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2016041093

Prepared for

THE CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
200 North Spring Street, Room 667
Los Angeles, CA 90012

Prepared by

TERRY A. HAYES ASSOCIATES INC.
3535 Hayden Avenue, Suite 350
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August 2021

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FINAL EIR APPENDICES

In hard copies of the Final EIR the appendices are not printed out but are available at:
https://planning.lacity.org/development-services/eir.

Draft EIR Appendices that are being Refined and Replaced

Appendix C: *Updated* Proposed Change Area Map and Change Matrix (August 2021)
Appendix D: *Updated* Draft Community Plan (August 2021)
Appendix E: *Updated* CPIO (August 2021)

New EIR Appendices

Appendix O - 2020 USGS Fault Study
Appendix P - Discussion of Modifications to Appendix G of the CEQA Guidelines
Appendix Q - Bracketed comments (all Draft EIR and Recirculated Draft EIR)

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1.0 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared to comply with the requirements of California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21000 *et seq.* and Title 14 Code of California Regulation (CCR) Section 15000 *et seq.* (the "CEQA Guidelines").

1.1 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, the CEQA requires the Lead Agency to prepare and certify a Final EIR. CEQA Guidelines Section 15132 states that a Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft EIR;
(b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
(e) Any other information added by the Lead Agency.

1.2 PUBLIC REVIEW PROCESS

At the outset of the environmental review process, the Los Angeles Department of City Planning (DCP) prepared a Notice of Preparation (NOP) for the Hollywood Community Plan Update (State Clearinghouse No. 2016041093) (Proposed Project or Proposed Plan). The NOP was published and distributed to the State Clearinghouse, trustee agencies, responsible agencies, and other interested parties on April 29, 2016 for a 30-day public review period; the comment period was then extended to June 15, 2016 for a total of 49 days. A public scoping meeting was held on May 16, 2016. The Draft EIR was circulated for a 75-day public review period from November 15, 2018 to January 31, 2019.

After the publication of the Draft EIR in November 2018, the Natural Resources Agency certified new guidelines for transportation impacts under CEQA in response to Senate Bill (SB) 743 which directed the Office of Planning and Research (OPR) to establish criteria for determining the significance of transportation impacts by a metric other than level of service (LOS) or similar measures of vehicular capacity or traffic congestion. In response to SB 743 and the new CEQA Guidelines Section 15064.3, *Determining the Significance of Transportation Impacts*, the City of Los Angeles adopted new transportation thresholds for CEQA in July 2019. Based on this, DCP prepared a Partially Recirculated Draft Environmental Impact Report (RDEIR) for the Proposed Plan. The Partially RDEIR was circulated for a 47-day public review period from October 31, 2019 to December 16, 2019. The only portions recirculated were Section 4.15, Transportation and Chapter 5.0, Alternatives, and a new Appendix N.

1.3 CONTENTS AND ORGANIZATION OF THE FINAL EIR

This document summarizes the project information presented in the Draft EIR and contains responses to comments on environmental issues received from agencies, organizations, and persons who reviewed the Draft EIR. This Final EIR is comprised of five chapters:

Chapter 1 – Introduction: This chapter includes an overview of the Proposed Plan, a summary of the alternatives considered, and a summary of the environmental impacts.

Chapter 2 – Modifications and Technical Refinements to the Proposed Plan and Environmental Effects: This chapter describes the modifications and technical refinements to the Proposed Plan and discusses the extent to which the changes would have effects on the environment and would result in new or more severe significant impacts than those identified in the Draft EIR and RDEIR.

Chapter 3 – Responses to Comments: This chapter contains a summary of the written comments received on the Draft EIR and the Partially RDEIR by the DCP during the two public review periods and responses to each comment. A list of persons, organizations, and public agencies commenting on the Draft EIR is provided.

Chapter 4 – Corrections and Additions: This chapter provides a list of changes that were made to the Draft EIR and Partially RDEIR in response to comments received during the two public review periods, and through the public hearing and adoption process, as well as clarifying language regarding intent, consistency, and other non-substantive changes.

Chapter 5 – Mitigation and Monitoring Program: This chapter describes the procedures for implementing the mitigation measures identified in the Draft EIR by outlining the implementing agency, enforcement agency and monitoring agency, and monitoring phase/monitoring actions for each mitigation measure.

Appendices: The following EIR Appendices have been modified and technical refinements have been made (changes are summarized in Chapter 2.0) and are replaced in their entirety (and are included in this Final EIR document):

- Appendix C: *Updated* Proposed Change Area Map and Change Matrix (August 2021)
- Appendix D: *Updated* Draft Community Plan (August 2021)
- Appendix E: *Updated* CPIO (August 2021)

The following appendices are added as a correction or addition to the EIR as described in Chapter 4.0:

- Appendix O: U.S. Geological Survey–California Geological Survey Fault-Imaging Surveys Across the Hollywood and Santa Monica Faults, Los Angeles County, California
- Appendix P: Modifications to CEQA Guidelines Appendix G

1.4 SUMMARY OF THE PROPOSED PLAN

The Proposed Plan is a comprehensive update of the Hollywood Community Plan, one of the City's 35 Community Plans. The Proposed Plan addresses changes (including state and regional regulatory and policy changes) that have occurred since the existing Hollywood Community Plan (Existing Plan) was last updated in 1988. The updated community plan is intended to guide development in the Hollywood Community Plan Area (CPA) through 2040.

The Proposed Plan includes amending both the text and the land use map of the Hollywood Community Plan. The Proposed Plan would also adopt several zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development regulations (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan (Station Neighborhood Area Plan [SNAP]), establishment of a Hillside Construction Regulation (HCR) Supplemental Use District, amendments to the Hollywood Redevelopment Plan, and development of a Community Plan Implementation Overlay (CPIO) District.

Since the publication of the Draft EIR and Partially RDEIR, modifications and technical refinements to the Proposed Plan have been made in the Community Plan (policy document), plan and zoning maps, and the CPIO District, as well as adding new Hillside Construction Regulations and an ordinance to amend the Hollywood Redevelopment Plan. These refinements are discussed in Chapter 2.0, Modifications and Technical Refinements to the Proposed Plan and Environmental Effects, of this Final EIR.

PROJECT OBJECTIVES

The **primary objectives** of the Proposed Plan are as follows:

- Accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element, including:
  - Maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts,
  - Direct growth to transit hubs and corridors,
  - Plan for increases to the housing supply,
  - Encourage a better balance of jobs and housing with mixed-use development,
  - Accommodate commercial uses for future employment opportunities, and
  - Focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space.
- Direct growth away from low-density neighborhoods; preserve single-family and low-density residential neighborhoods.
- Provide a range of employment opportunities; promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry.
- Protect historical and cultural resources.

The **secondary objectives** of the Proposed Plan are as follows:

- Encourage and promote a variety of mobility options; make streets walkable.
- Improve the function and design of neighborhoods throughout the Project Area by preserving and strengthening the appearance of the overall Project Area to promote pedestrian-friendly environments, nurture neighborhood character, improve economic vitality, create identity, and integrate a combination of land uses to create positive visual experiences.
- Improve open space, parks and public spaces.
- Provide adequate public services and infrastructure.
- Encourage sustainable land use.
- Maintain Land Use and Zoning Consistency.

The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the City, including the Hollywood Community Plan Area, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of Senate Bill (SB) 375 and the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SB 375 coordinates land use and transportation planning to reduce greenhouse gas emissions and, to that end, requires SCAG to prepare an SCS as an integral part of the RTP, which is a 20-year transportation plan for the region that addresses regional growth, air quality and other issues, based on an analysis of past and future regional trends.

1.5 SUMMARY OF THE PROPOSED PROJECT IMPACTS

Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic

significance." In order to approve a project with significant and unavoidable impacts, the lead agency must adopt a written Statement of Overriding Considerations (in accordance with Section 15093 of the CEQA Guidelines) demonstrating that the decisionmaker has found that on balance the benefits of approving the Proposed Plan outweigh the negative environmental consequences.

Based on the analysis contained in the Draft EIR and the Partially RDEIR, the Proposed Plan would create significant and unavoidable impacts related to the following environmental topics and impact categories:

- **Air Quality**
  - Project Impacts:
    - Air Quality Standards related to construction emissions for NOx, $PM_{2.5}$, PM_{10}
    - Air Quality Standards for Operational for VOC
    - Non-Attainment Criteria Pollutants,
    - Sensitive Receptors during construction
  - Cumulative Impacts:
    - Air Quality Standards
    - Non-Attainment Criteria Pollutants
    - Sensitive Receptors during construction
- **Biological Resources**
  - Project Impacts:
    - Special Status Species
    - Riparian Habitat and Other Sensitive Natural Community
    - Wetlands
    - Migratory Wildlife
  - Cumulative Impacts:
    - Special Status Species
    - Riparian Habitat and Other Sensitive Natural Community
    - Wetlands
    - Migratory Wildlife
- **Cultural Resources**
  - Project Impacts:
    - Historical Resources
  - Cumulative Impacts:
    - Historical Resources
- **Noise**
  - Project Impacts:
    - Groundborne Vibration
    - Permanent Increase in Ambient Noise– Operational Stationary Noise
    - Temporary Increase in Ambient Noise from Construction
  - Cumulative Impacts:
    - Temporary Increase in Ambient Noise from Construction
    - Permanent Increase in Ambient Noise– Operational Stationary Noise
    - Groundborne Vibration
- **Public Services**
  - Project Impacts:
    - Degradation of Existing Parks and Recreational Facilities
  - Cumulative Impacts:
    - Degradation of Existing Parks and Recreational Facilities

Based on the analysis contained in the Draft EIR and RDEIR, the following environmental topics and impact categories were found to result in a less-than-significant impact, no impact, or a significant impact that can be mitigated to be less than significant:

- **Aesthetics** (Scenic Vista; Scenic Resources Within a State Scenic Highway; Visual Character; Shade and Shadow; Light and Glare)
- **Agricultural Resources** (Important Farmland; Williamson Act; Timberland/Forest Land Conflict; Forest Land Conversion; Conversion of Farm or Forestland)
- **Air Quality** (Air Quality Plan; Sensitive Receptors for Operations; Odors)
- **Biological Resources** (Local Polices or Ordinances; Habitat Conservation Plan)
- **Cultural Resources** (Archaeological Resources; Paleontological Resources; Human Remains; Tribal Cultural Resources)
- **Geology & Soils** (Earthquake Fault; Seismicity; Seismic-Related Ground Failure; Soil Erosion; Geologic Hazards / Unstable Soils; Expansive Soil; Septic Tanks)
- **Greenhouse Gas Emissions** (Greenhouse Gas Emissions; Applicable Plans, Polices, or Regulations)
- **Hazardous and Hazardous Materials** (Hazardous Materials Transport, Use, Disposal; Hazardous Materials Upset or Accident; Hazardous Materials Upset or Accident; Hazards within 1/4 Mile of a School; Hazardous Materials Sites; Public Airport or Airport Plan; Private Airstrip; Emergency Response Plans; Wildland Fire)
- **Hydrology and Water Quality** (Water Quality Standards/Discharge Requirements; Groundwater; Drainage - Erosion or Siltation; Drainage – Flooding; Stormwater Drainage Systems; Water Quality; Housing in Flood Hazard Area; Structures Impeding Flood Flows; Risk from Flooding; Risk from Inundation; Flooding During 50-year Storm Event)
- **Land Use and Planning** (Physically Divide a Community; Land Use Plans and Policy Consistency; Habitat Conservation Plans)
- **Mineral Resources** (Statewide/Regional Mineral Resources; Local Mineral Resources)
- **Noise** (Noise Levels; Groundborne Vibration/Noise during operations; Permanent Increase – Mobile Noise; Noise Exposure – Airport Plan; Noise Exposure – Private Airstrip)
- **Population, Housing & Employment** (Induce Substantial Population Growth; Displacement of Existing Housing; Displacement of People)
- **Public Services** (Fire Protection & Emergency Services; Police Protection Facilities; Public Schools; Parks and Recreational Facilities – Construction of New Facilities; Libraries)
- **Transportation and Traffic** (Transportation plans, Vehicle Miles Traveled [VMT]; Design Feature Hazards; Emergency Access)
- **Utilities and Service Systems** (Water Treatment Facilities; Water Supply; Wastewater Treatment Requirements; Wastewater Treatment Facilities; Stormwater Drainage Facilities; Wastewater Treatment Capacity; Solid Waste Disposal; Solid Waste Regulations; Energy - Electricity; Energy – Gas)

2.0 MODIFICATIONS AND TECHNICAL REFINEMENTS TO THE PROPOSED PLAN AND ENVIRONMENTAL EFFECTS

As a result of comments received on the Draft Environmental Impact Report (EIR), Recirculated Draft Environmental Impact Report (RDEIR) and through the Proposed Plan's public hearing process with recommended changes from the City Planning Commission (CPC), changes to the Proposed Plan have been made in the Community Plan (policy document), plan and zoning maps, and the Community Plan Implementation Overlay (CPIO) District. As discussed in this Section, the changes to the Proposed Plan are found to have been analyzed in the Final EIR and this Modification and Technical Refinement Section clarifies or makes minor modifications to the analysis contained in this Final EIR and does not result in significant new information under California Environmental Quality Act (CEQA) Guidelines Section 15088.5 as a result of causing a new significant impact or a substantial increase in the severity of an environmental impact. Although this Modification and Technical Refinements Section does not constitute significant new information per CEQA, the modifications and refinements remain subject to final adoption by the City Council and Mayor, similar to the other elements of the Proposed Plan.

As used herein, Final EIR refers to the Draft EIR and the RDEIR together with this Final EIR document.

2.1 MODIFICATIONS AND REFINEMENTS TO THE PROPOSED PLAN

DRAFT COMMUNITY PLAN (UPDATED APPENDIX D)

Multiple comments on the Draft Community Plan (policy document) were received during the Draft EIR public comment period, including requests to add or augment policies and programs for a number of planning topics, including affordable housing, hillsides, open space preservation and access, historic preservation, and mobility. In addition, public comments for the policy document have been solicited and received on an ongoing basis over the years. A comprehensive updated Draft Community Plan was released in 2020, and additional public input from stakeholders and members of the public were received. The February 2021 version was released as a CPC-2016-1450-CPU Staff Report Exhibit (Exhibit B) for the CPC meetings on February 18 and March 18.

The August 2021 Draft Community Plan included with the Final EIR replaces the 2018 version released with the Draft EIR and is referenced as the updated Appendix D in this Final EIR. It incorporates the most recent recommendations of the City Planning Commission, including technical modifications.

Changes to the policy document include but are not limited to:

- Chapter 1: Updated the Redevelopment Project section under the Relationship to Other Agency Plans and inserted a description of the Hillside Construction Regulation Supplemental Use District.
- Chapter 2: Added additional economic development information.
- Chapter 3: Updated the Community Themes section; clarified or added policies and programs to preserve single-family residential areas in the hillsides; inserted policies for Low-Scale Multi-Family Residential; added policies and programs to encourage affordable housing development and minimize displacement; added policies and programs to support small local serving businesses and local employment; inserted a program to evaluate contractors in terms of wages, benefits, and local hiring provisions; added policies for industrial, media-related uses that promote jobs; and added policies and programs to encourage the

planting of shade trees and to preserve mature trees. In addition, Table 2-1, Table 3-1 and Figure 3-1 were updated.

- Chapter 4: Added policies and programs to encourage the planting of shade trees and to preserve mature trees; added policies and programs to protect existing natural areas and wildlife habitat; added policies and programs to support better trail connections and access to parks and open space resources; added policies and programs to support conversion of City owned vacant land in the hillsides into open space for conservation; and inserted a policy to support mobile vending.
- Chapter 5: Updated preservation policies and programs.
- Chapter 6: Added programs to improve multiple modes of mobility and circulation access. Figure 6-1 was updated to reflect revisions to street designations.

PROPOSED CHANGE AREA MAP AND CHANGE MATRIX (UPDATED APPENDIX C)

Multiple comments were received during the Draft EIR public comment period regarding the Proposed Plan's land use designations, and zoning, including [Q] Qualified Conditions and "D" Development Limitations. Over the years, additional public comments on the Proposed Plan's proposed land use and zoning have been submitted on an ongoing basis. Updated recommendations for land use and zoning were publicly released in the forms of draft maps and draft regulations matrices in 2019 and 2020. The February 2021 version was released as a Staff Report exhibit (Exhibit E) for the CPC meeting (Planning case number CPC-2016-1450-CPU).

The August 2021 Proposed Change Area Map and Change Matrix included with this Final EIR replaces the 2018 version released with the Draft EIR and is referenced as the updated Appendix C in this Final EIR. It incorporates the CPC recommendations, including technical modifications and changes to a few selected Change Areas in the Regional Center and commercial corridors.

Changes to the land use designations and zone and height districts, include but not limited to:

Regional Center

- Change in proposed zoning from C4 to C2.
- Change the proposed base floor area ratio (FAR) to 4:1 for subareas 4:2C, 4:3, 4:3A, 4:4, 4:4A, 4:5, 4:5A, 4:5B, 4:5C, 4:5D, 4:5J, 4:5L, 6:1, 6:2, and 6:4, located around the Metro B Line Hollywood/Vine Station.
- Addition of a parcel on Sunset Boulevard between El Centro Avenue and Gower Street to Subarea 4:5C.
- Increase the proposed height limit to 75 feet from 36 feet for a few parcels along or near Cahuenga Boulevard south of Hollywood Boulevard.
- Removal of the proposed 75-foot height limit for parcels along Selma Avenue, Las Palmas Avenue, and Wilcox Avenue south of Hollywood Boulevard.
- Increase the proposed FAR of Subarea 4:5L to 3:1.

Transit Corridors

- Application of the citywide standard 1.5:1 FAR for commercial zones to selected areas around the Santa Monica Boulevard and Vine Street intersection, and along Vine Street south of Santa Monica Boulevard, including the addition of parcels along Vine Street (Subareas 19:5 and 19:6).
- Addition of a few parcels along Western Avenue north of Virginia Avenue to Subarea 41:6. Change the proposed height limit of Subarea 41:6 to 50 feet from 45 feet.
- Change the proposed FAR of parcels along La Brea Avenue generally between Hollywood Boulevard and Fountain Avenue to 1.5:1.
- Application of a more consistent height limit on Sunset Boulevard west of La Brea Avenue.

- Establish a 30-foot height limit along Gower Street near the Selma-La Baig historic district.
- Addition of a few parcels along Hyperion Avenue to Subarea 13:2.
- Removal of the 36-foot height limit proposed for Subarea 13:1, with direction for the City Council to determine a height limit that would achieve affordable housing for this subarea.

Multi-family Residential

- Reductions to the proposed zoning of Subareas 2:2, 3:2B, 3:2G, 3:3, 6, 6:1A, 5:1, 5:1A, 17, 22, 41, 9:2, and 25:3. The reductions may include FAR, height, density or a combination of these.

Media/Entertainment

- Expansion of the jobs FAR incentive to selected additional areas in the Media District along Santa Monica Boulevard. The incentive would allow 3:1 FAR for projects that provide at least 0.7:1 FAR of targeted media-related uses, such as media production, sound recording, broadcast studios, and facilities for the development of computer and media-related products and services.
- Removal of a frontage depth height limit for Subarea 40:1B.
- Allowance of ground floor restaurant and retail uses, limiting individual premises to 20,000 square feet or less, within the incentivized job areas of the Media District.

Administrative Changes

- Additional parcels being used as public facilities or open space conservation were identified and re-designated as Public Facilities or Open Space, with corresponding zone changes.

Hillside Construction Regulation (HCR) Supplemental Use District

- Establishment of a HCR District for additional single-family residential areas in the hillsides, which expands the application of the regulations to larger areas of hillside neighborhoods.

PROPOSED CPIO (UPDATED APPENDIX E)

Multiple comments were submitted during the Draft EIR public comment period and over the years regarding the Proposed Plan's CPIO District. A concepts draft was published with the Draft EIR in November 2018. Due to comments received about affordable housing and historic protection, the Hollywood CPIO was then revised to include a tailored affordable housing incentive system to encourage mixed-income housing and 100 percent affordable housing, and to establish additional project review procedures and add additional development standards for projects with historic resources. The revised CPIO document was released in 2020, and DCP staff held multiple office hours and webinars to explain the updated draft. The February 2021 Proposed CPIO was released as a draft ordinance with maps and as a CPC-2016-1450-CPU Staff Report Exhibit (Exhibit E) for the CPC meeting.

The August 2021 Proposed CPIO included with this Final EIR replaces the 2018 version released with the Draft EIR and is referenced as the updated Appendix E in this Final EIR. It incorporates the recommendations of the CPC, including technical modifications and a few changes to the draft ordinance and the CPIO maps pertaining to the Regional Center and Corridors subareas.

Changes to the proposed CPIO District Ordinance including but not limited to:

- Establishment of a tailored affordable housing incentive system for mixed-income and 100 percent affordable housing projects based on the Transit Oriented Communities affordable housing incentive system.
- Expansion and clarification of a review process for projects involving designated and eligible historic resources.

- Expansion and clarification of development standards, including ones for use, pedestrian-oriented design, parking, and historic preservation.
- Refined the subarea boundaries within the CPIO District and defined the four types of CPIO Subareas: Regional Center, Corridors, Multi-family Residential, and Character Residential.
- Added a community benefits FAR incentive for the Regional Center Subarea for non-residential projects that provide publicly-accessible outdoor amenity space.
- Change the Bonus FAR of Regional Center RC1B Subarea to 6.75:1 FAR, and allow the Bonus Density in Regional Center RC1B Subarea to be limited by the FAR.
- Elimination of separate affordable housing incentives types for Corridors 2 to 5 by applying the same set of Corridor 2 incentives to Corridors 2 to 5 to encourage affordable housing development.

2.2 REFINEMENTS TO THE PROPOSED PLAN'S REASONABLE EXPECTED DEVELOPMENT

On March 18, 2021, the CPC recommended approval of the Hollywood Community Plan including the refinements described above to increase opportunities for mixed-income housing development. The CPC recommended changes to the CPIO affordable housing incentive system to increase the density and floor area ratio (FAR) bonus of selected areas near the Hollywood/Vine Metro B (Red) Line station (CPIO RC1B subarea), and commercial corridors, including portions of Vine Street, Santa Monica Boulevard, Western Avenue, Sunset Boulevard, Melrose Avenue, and La Cienega Boulevard. The CPC recommended allowing the density bonus of RC1B subarea to be determined by a 6.75:1 FAR. For the commercial corridors mentioned above that now comprise CPIO Corridor 2, the incentives would allow for a two-story height increase, and some increases to the FAR and density to promote the development of affordable housing near transit systems. These recommended changes are reasonably expected to increase the total number of housing units.

The CPC also recommended a geographic expansion of the jobs incentive FAR in and near the Media District area along Santa Monica Boulevard, where additional Limited Industrial parcels would be able to seek a higher FAR, 3:1 instead of 1.5:1, for providing certain media-related industrial uses, such as media production, sound recording, and broadcasting, on site. The additional FAR could be used for other employment-generating uses.

The information provided below in Section 2.3 addresses the CPC's direction to staff to prepare additional analysis as necessary to comply with CEQA prior to transmittal of CPC recommendations to the City Council.

POPULATION AND HOUSING

Consistent with how the Proposed Plan applied a ten percent utilization of optional affordable housing incentives, the same percentage was used to determine the additional number of housing units that may be reasonably expected from the recent recommendations. The total number of reasonably expected housing units for the 2040 horizon year analyzed in the Draft EIR and RDEIR was approximately 132,000, the forecasted population was 264,000 persons, and forecasted employment was 127,000. The modifications to the Proposed Plan described above would result in approximately 139,000 housing units, which is about 7,000 more units than identified in the Draft EIR and RDEIR. The City finds the increase of 7,000 units would not result in an increase in population. The analysis in the EIR took an overly conservative approach, first by analyzing the highest end of the range of potential development, and second by analyzing all new housing units as occupied without factoring any of the units as vacant. However, the City finds based on

multiple reliable data sources that some of the housing units in the Plan Area, would be reasonably expected to be vacant. The Hollywood CPA has been experiencing higher vacancy rates than that of the Citywide average, according to the 2010 Census and recent American Community Survey (ACS) 5-year data estimates. It is reasonably expected that there would be a certain amount of unoccupied housing units in the future, instead of 100 percent occupancy. The higher vacancy rate in the Hollywood CPA in recent years may be based on the amount of new residential and mixed-use development projects that have been built in central Hollywood near transit systems but had not yet received a certificate of occupancy or completed leasing at the time of the ACS survey. The recent 2019 5-year ACS data indicated a 7.3 percent vacancy rate for the City of Los Angeles, and a 13.1 percent vacancy rate for the CPA. Applying a 13.1 percent vacancy rate to the number of housing units reasonably expected in the CPA is feasible but not necessarily reasonable. Therefore, taking the Citywide average vacancy rate of 7.3 percent is more reasonable and applying that percentage to the housing units that could be built by 2040 in the Hollywood CPA would result in approximately 129,000 occupied housing units and using the same 2.0 persons per household ratio[1] that was utilized in the EIR, the population would be approximately 258,000 persons. The EIR analyzed a future reasonably expected population of approximately 264,000 persons, which is approximately two percent greater than this current population estimate. If a higher vacancy rate is utilized for the Hollywood CPA, the reasonably expected population would further decrease.

EMPLOYMENT

The reasonably expected employment numbers for 2040 would increase in the Media District area with the inclusion of additional parcels, and the total number of jobs in the CPA would be approximately 130,0000. This number is slightly higher than the upper end of the range identified in the EIR, which was 124,000 to 127,000 expected jobs. This change is analyzed below along with the other modifications and refinements.

2.3 ENVIRONMENTAL IMPACTS OF TECHNICAL REFINEMENTS TO THE PROPOSED PLAN

AESTHETICS

The Final EIR determined that the Proposed Plan would not have an adverse effect on scenic vistas, would not substantially damage scenic resources, and would not substantially degrade the existing visual character or quality of the Plan Area. However, impacts related to lighting and glare would require mitigation to reduce impacts to less than significant. The modifications and technical refinements to the Proposed Plan would include additional policies and programs to encourage the planting of shade trees and to preserve mature trees, protect existing natural areas and wildlife habit, and preserve open space resources. These additional policies and programs would serve to improve the visual character of the Plan Area. Height bonus incentives proposed under the CPIO are similar to the ones under the TOC program and in generally the same areas, which were already considered in the analysis. The additional zone changes that removed or reduced height restrictions in the Regional Center are for urban infill areas where the existing heights already vary. In other areas where height limits were added or reduced, there would be no new significant impacts based on the same analysis provided in the Draft EIR in Section 4.1 because while changes would occur in the Plan Area, the development resulting from the modifications and refinements would occur in an eclectic urban environment and the foreseeable development is consistent with an urban environment. Therefore, the technical refinements to the Proposed Plan would not result in new significant impacts related to aesthetic resources.

[1] Persons per household refers to the number of persons that live in an occupied housing unit. The 2.0 persons per household average is based on SCAG's 2040 projections from the 2016-2040 RTP/SCS plan.

AGRICULTURE AND FORESTRY RESOURCES

The Final EIR determined that the Proposed Plan would result in no impacts to agriculture and forestry resources. The modifications and technical refinements to the Proposed Plan would include additional policies and programs to protect natural resources and natural features of the environment. The technical refinements do not include provisions for the conversion of farmland, would not result in a new conflict with existing zoning for agricultural uses, would not result in a new conflict with existing zoning of forest or timberland, or result in the loss or conversion of forest land to non-forest use. Therefore, the technical refinements to the Proposed Plan would not result in new significant impacts related to agricultural and forestry resources.

AIR QUALITY

The Final EIR determined that the Proposed Plan would result in a less than significant impact related to consistency with air quality plans, exposure of sensitive receptors to substantial pollutant concentrations during operation, and odors. Impacts related to violation of air quality standards during construction and operations, cumulative increase in pollutants during construction and operations, and exposure of sensitive receptors to pollutant concentrations during construction would be significant and unavoidable.

The EIR includes analysis of construction pollutant emissions based on four anticipated scenarios for construction within the Plan Area (two heavy-duty equipment operating and 25 daily truck trips, four heavy-duty equipment and 50 daily truck trips, eight pieces of heavy-duty equipment and 100 daily truck trips, and ten pieces of heavy-duty equipment and 150 truck trips). Although air pollutants generated in the Plan Area could incrementally increase due to a marginally increased average anticipated rate of development, the timing and location of such development would continue to not be reasonably foreseeable; construction resulting from the modifications and technical refinements to the Proposed Plan would be of similar intensity and impact conclusions would not change.

Regarding operational air pollutant emissions, the EIR includes analysis of both mobile sources and area (development) sources. Mobile source emissions resulting from the modifications and technical refinements to the Proposed Plan would not be substantially different from what was evaluated in the EIR because VMT would not be expected to change substantially (see discussion of Transportation and Traffic below) and mobile source emissions would continue to be less than today. Increased development near transit centers could reduce operational air pollutant emissions by reducing mobile trips in the region. Population and therefore VMT associated with the resident population would not increase and therefore associated emissions would not increase. Trips generated by additional jobs would occur in areas that generate less VMT per Service Population than the overall average VMT per Service Population in the Plan Area; increases in mobile source emissions would be relatively small and mobile source emissions would continue to be less than existing conditions. Additional residential and employment-related development would incrementally increase emissions from areas sources and would increase use of consumer products. The chart below shows changes in stationary source emissions under the Proposed Plan compared to changes in stationary source emissions under the Modified Plan.

As shown in the table below, the changes in stationary source emissions would be minor; such changes are generally well within the error margin of the modeling. The incremental change in development would not necessitate additional air quality modeling. Mitigation proposed as part of the Final EIR would still be applicable to the technical refinements to the Proposed Plan and would reduce air quality impacts in the same way resulting in the same level of significance after mitigation. Therefore, the modifications and refinements to the Proposed Plan would not result in new significant impacts related to air quality.

Change in Stationary Source Emissions – Original Plan Compared to Modified Plan			
Pollutant	**Original Plan Increase Compared to Existing Conditions**	**Modified Plan Increase Compared to Existing Conditions**	**Percentage Point Increase /a/**
ROG	29.3%	30.2%	0.9
NO_X	26.1%	27.5%	1.4
CO	21.6%	23.8%	2.3
SO_X	26.4%	27.8%	1.3
PM_{10}	26.4%	27.8%	1.3
$PM_{2.5}$	26.4%	27.8%	1.3
/a/ Percentages have been rounded and calculation of percentage point change is rounded based on exact numbers.			

BIOLOGICAL RESOURCES

The Final EIR determined that the Proposed Plan would result in a less than significant impact regarding local policies and ordinances and no impact related to habitat conservation plans. Impacts related to special Status species habitat, riparian habitat, wetlands, and migratory wildlife would be significant and unavoidable. The modifications and technical refinements to the Proposed Plan would include additional policies and programs to encourage the planting of shade trees and to preserve mature trees, protect existing natural areas and wildlife habit, and preserve open space resources. The modifications and technical refinements that would have the potential for additional development rights would only be in developed areas of central Hollywood, such as in the Regional Center and along commercial corridors served by transit systems, and in the Media District limited industrial area. These areas are infill development areas, away from hillside areas and would not affect additional wildlife or habitats not already analyzed and disclosed within the Final EIR. Additionally, the modifications include expanding Hillside Construction Regulations that would result in reduced construction impacts as a result of limiting the amount of grading and number of truck trips, setting equipment standards and restricting construction hours. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to biological resources.

CULTURAL RESOURCES

The Final EIR determined that the Proposed Plan would result in a less than significant impact or less than significant impact with mitigation to cultural resources, with the exception of historical resources which the Proposed Plan would result in a significant and unavoidable impact. The modifications and technical refinements to the Proposed Plan would result in increased development potential within the Plan Area. Although development would be incrementally increased and additional historic properties could be affected, such development would occur in areas that are evaluated in the EIR. The CPIO includes development standards for future projects to maintain design compatibility with the Hollywood Boulevard Commercial and Entertainment District and six designated and eligible historic residential neighborhoods and has review procedures for projects that involve historic resources for the purpose of historic preservation. Therefore, impacts as a result of the modifications and technical refinements impacts would be similar to what was analyzed and disclosed within the Final EIR. Mitigation measures identified within the Final EIR would be applicable to the modifications and technical refinements to the Proposed Plan and could reduce impacts to archaeological, paleontological and tribal cultural resources, with the exception of historical resources. Mitigation measures to reduce impacts to historical resources were found to be infeasible, and although as discussed in the Final EIR impacts would be unlikely, over the plan horizon there could be some impacts to historical resources even with the new CPIO procedures. Therefore, historical resources would still result in a

significant and unavoidable impact. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to cultural resources.

GEOLOGY AND SOILS

The Final EIR determined that the Proposed Plan would result in a less than significant impact or no impact to geology and soils. The modifications and technical refinements to the Proposed Plan would result in increased development potential within the Plan Area. But additional development would be required to comply with the California Building Code and Los Angeles Building Code to ensure that new buildings would meet seismic and geologic safety standards. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to geology and soils.

GREENHOUSE GAS (GHG) EMISSIONS

The Final EIR determined that the Proposed Plan would result in a less than significant impact related to GHG emissions. The modifications and technical refinements described above would result in minor changes to the project area-scale and regional-scale GHG emission estimates presented in the Final EIR. The Proposed Plan stationary source GHG emissions would increase by approximately 27.9 percent compared to existing conditions; the Modified Plan would result in this change being 29.4 percent compared to existing conditions (an incremental increase of an additional 1.5 percentage points). Such changes related to the GHG emission calculations would generally be within the error margin of modeling efforts. Overall, the Proposed Plan would reduce GHG emissions in the region by concentrating development in the Regional Center and near commercial corridors served by transit systems, which could generally reduce the length and number of regional vehicle trips. Although, the modifications and technical refinements could result in an incremental increase in vehicle trips, the refinements would further shift development towards density and proximity to transit, thereby potentially reducing GHG emissions in the region. The modifications and technical refinements would further consistency with Assembly Bill 32, Senate Bill 32, Senate Bill 375, and the Southern California Associations of Government (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2020 RTP/SCS, regional and local strategies to reduce GHG, and can be expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to GHG emissions.

HAZARDS AND HAZARDOUS MATERIALS

The Final EIR determined that the Proposed Plan would result in a less than significant impact or less than significant impact with mitigation related to hazards and hazardous materials. The modifications and technical refinements to the Proposed Plan would result in incrementally increased development within the Plan Area. But additional development would be required to comply with the same hazardous materials federal, state, and local regulations that were disclosed within the Final EIR. Although development would be incrementally increased, it would occur in areas where hazards and hazardous materials are already evaluated in the EIR. Therefore, impacts as a result of the modifications and technical refinements impacts would be similar to what was analyzed and disclosed within the Final EIR. Mitigation proposed as part of the Final EIR would still be applicable to the modifications and technical refinements to the Proposed Plan and would reduce hazards and hazardous materials in the same way resulting in the same level of significance after mitigation. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to hazards and hazardous materials.

HYDROLOGY AND WATER QUALITY

The Final EIR determined that the Proposed Plan would result in a less than significant impact related to hydrology and water quality. The modifications and technical refinements to the Proposed Plan would result in incrementally increased development within the Plan Area. But additional development would be required to comply with the same federal, state, and local water quality and water infrastructure regulations that were

disclosed within the Final EIR. The development would occur in the same already developed areas analyzed in the EIR and would therefore not result in any different impacts related to drainage or flood risks. Therefore, the technical refinements to the Proposed Plan would not result in new significant impacts related to hydrology and water quality.

LAND USE AND PLANNING

The Final EIR determined that the Proposed Plan would result in no impact or a less than significant impact related to land use and planning. The modifications and technical refinements to the Proposed Plan would result in incrementally increased development within the Plan Area. Such development would be similar to what was analyzed and disclosed in the Final EIR, the technical refinements would not physically divide an established community, would increase consistency with land use plans and policies as it puts more development near transit and commercial corridors and regional centers, and would not conflict with a Habitat Conservation Plan. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to land use and planning.

MINERAL RESOURCES

The Final EIR determined that the Proposed Plan no impact would occur related to mineral resources. The modifications and technical refinements to the Proposed Plan would result in increased development potential within the Plan Area. Although development would be incrementally increased it would occur in areas already evaluated in the Final EIR and impacts as a result of the modifications and technical refinements impacts would be similar to what was analyzed and disclosed within the Final EIR. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to mineral resources.

NOISE

The Final EIR determined that the Proposed Plan would result in no impacts related to generation of noise levels in excess of standards and exposure of people to excessive airport noise levels. Impacts related to operational vibration and operational mobile noise would be less than significant. Impacts related to temporary construction noise, operational stationary sources, and construction vibration would be significant and unavoidable.

The modifications and technical refinements to the Proposed Plan could result in incrementally increased development within the Plan Area. The extent of noise and vibration generated in the Plan Area could similarly incrementally increase due to increased development. Although the number of construction sites could increase, the intensity of construction and the types of construction noise and construction vibration impacts that could occur with the modifications and refinements would be similar to what was already in the Final EIR. The number of stationary and mobile sources of noise (from employee trips) may be incrementally increased but would not be substantially different from what was analyzed in the Final EIR and impacts would remain the same.

Operational stationary sources of noise include but are not limited to heating, ventilation, and air conditioning (HVAC) equipment and rooftop bars. Noise levels and the types of noise that would be produced would be the same as what was analyzed in the Final EIR. Similar to the Final EIR, there would still be the potential for stationary sources of noise to result in a permanent increase in noise without knowing the specific locations of developments at this time. Development would still be concentrated within the Regional Center, commercial corridors near transit systems, and in the Media District area, which already experience existing elevated noise levels in these areas; proposed modifications and technical refinements are not anticipated to substantially change noise levels including in these areas beyond what was already analyzed in the Final EIR. Overall, the modifications and technical refinements to the Proposed Plan would result in minimal changes to population and associated noise from trips (mobile source noise). The additional jobs would generate more trips in areas that already experience high levels of mobile source noise. The

increase in activity would not be enough to result in a noticeable change in mobile-source noise (a doubling in traffic is necessary to increase noise by 3 dBA, a 3 dBA increase in noise is at the limit of what is generally noticeable). Therefore, mobile noise would not substantially increase over what was analyzed and disclosed in the Final EIR. Mitigation proposed as part of the Final EIR would continue to be applicable to the modifications and technical refinements to the Proposed Plan and would reduce noise and vibration levels in the same way resulting in the same level of significance after mitigation. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to noise and vibration.

POPULATION, HOUSING, AND EMPLOYMENT

The Final EIR determined that the Proposed Plan would result in a less than significant impact related to population, housing, and employment. The Proposed Plan would not induce population growth but rather would be growth accommodating to address projected population and housing growth in the region. The modifications and technical refinements, similar to the Proposed Plan analyzed in the Final EIR, would not displace people or housing, except for potential temporary displacement during redevelopments. The areas that would accommodate additional development potential with the modifications and refinements have limited existing housing units (commercial corridors and the Regional Center) and impacts would remain similar to those already evaluated in the Final EIR. The modifications and technical refinements to the Proposed Plan would result in increased development in the Plan Area (see Section 2.2, above). Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to population, housing, and employment.

PUBLIC SERVICES

The Final EIR determined that the Proposed Plan would result in a less than significant impact related to public services, with the exception of degradation of existing parks and recreational facilities which the Proposed Plan would result in a significant and unavoidable impact. The modifications and technical refinements to the Proposed Plan would result in incrementally increased development but not an increase in population analyzed in the Final EIR (see Section 2.2, above), and therefore would not be expected to increase utilization of public services. The Los Angeles Police Department and Los Angeles Fire Department would continue to maintain acceptable service levels through the provision of additional personnel and equipment as needed, in conformance with their existing policies, procedures and practices as a result of any additional growth resulting from the modifications and technical refinements to the Proposed Plan. Schools would collect development impact fees from additional development to pay for new schools and facilities to accommodate additional growth, if necessary. Regarding libraries, the Branch Facilities Plan would continue to forecast future demand for library facilities throughout the City and strive to provide adequate facilities and related improvements to serve the existing and future population. In the event where there is increased use of park facilities, it would continue to result in a significant impact related to degradation of existing parks and recreational facilities similar to the impacts already discussed in the Final EIR. The incremental increase in utilization of public services and facilities would be similar to what was analyzed in the Final EIR. No new fire, police, school, or library facilities are anticipated to be constructed as part of the Proposed Plan at this time. The modifications and technical refinements to the Proposed Plan would not substantially change population compared to what was analyzed in the Final EIR and while employment would increase the increase would be relatively small and the impact on services and service ratios would be similar to that analyzed in the Final EIR.

If facilities for fire, police, schools or libraries were to be needed to meet demand from the modifications and refinements, impacts of construction and operation of such facilities would be anticipated to be similar to those analyzed in the Final EIR and less than significant. As discussed in the EIR, it is assumed that if new or expanded public service facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. The environmental impacts of the construction and operation of new facilities, as an allowed land use, have been evaluated throughout this EIR.

Specifically, the EIR analyzes anticipated effects of citywide growth related to air quality, noise, traffic, utilities, and other environmental impact areas. Depending on the location of new facilities, if they are determined to be needed, impacts could occur, however such impacts are too speculative to assess without information as to design, location and proximity to sensitive receptors. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to public services.

TRANSPORTATION AND TRAFFIC

The Final EIR determined that the Proposed Plan would result in a less than significant impact related to transportation and traffic. The modifications and technical refinements to the Proposed Plan include additional development potential in the Regional Center, commercial corridors near transit systems, and the Media District Area. The Vehicle Miles Traveled (VMT) data in the Hollywood Subareas Model was reviewed to determine the change in VMT for the areas with additional expected jobs and housing units. For the impact analysis, VMT is reported as Total Daily VMT per Service Population. The Total Daily VMT per Service Population is the total VMT divided by the number of people living or working within the Community Plan Area. This VMT is generated by residents, employees, and visitors in Hollywood and captures their travel within Hollywood as well as travel between Hollywood and their ultimate origin/destination. As discussed above, the modifications and refinements would not result in greater population but would result in greater number of employees.

Additionally, for the areas with increased housing units in the Regional and Corridor subarea and East subarea, the Total VMT per Service Population is 13.2 under 2040 Proposed Plan conditions. This means that the additional housing units are being placed in areas that produce less VMT per Service Population than the Plan Area overall. Therefore, the increase in housing units in these areas is not expected to result in the Total VMT per Service Population of the Plan Area exceeding 15.2 as reported in the Recirculated Draft EIR.

The Total Daily VMT per Service Population was reviewed for the traffic analysis zones (TAZs) in the Hollywood Subarea Model that have a change in land use to determine if these areas generate more or less VMT per Service Population as the Plan Area. As reported in the Recirculation Draft EIR in Tables 4.15-9 and 4.15-10, the Total VMT per Service Population in the Plan Area is 15.2 under 2040 Proposed Plan conditions. This level of future VMT per Service Population in the Plan Area is 57 percent below baseline conditions in the SCAG region (as shown in Table 4.15-9) and 17 percent below baseline conditions in the Plan Area (as shown in Table 4.15-10). For the Plan areas with increased employment, the Total VMT per Service Population is 15.1 under 2040 Proposed Plan Conditions. This means that the additional jobs are being placed in areas that produce less VMT per Service Population than the Plan Area overall. Given that the additional jobs would occur in areas that generate less VMT per Service Population than the overall average VMT per Service Population in the Plan Area, the increased growth is not expected to exceed the City's VMT impact thresholds (Impact 4.12-2) In addition, the modifications and technical refinements to the Proposed Plan would continue to enhance access to transit stations and create new land use to encourage transit use and active transportation and would not conflict with a program, plan, ordinance or policy addressing the circulation system (Impact 4.15-1) or increase hazards due to geometric design features (Impact 4.15-3). The Plan's impact to segment-level LOS with the modifications and technical refinements would also be similar and would not change the findings that of the emergency access evaluation and the City's ability to provide necessary fire and emergency services in the Plan area (Impact 4.15-4). Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to transportation and traffic.

UTILITIES AND SERVICE SYSTEMS

The Final EIR determined that the Proposed Plan would result in a less than significant impact related to utilities and service systems. The technical refinements to the Proposed Plan would result in incrementally increased development within the Plan Area. But additional incremental development would be required to comply with the same federal, state, and local utilities and service systems regulations that were discussed in the Final EIR.

The population would not increase it would not increase demand for electricity, natural gas, or water supply, wastewater disposal and solid waste disposal. The incremental increase in development but not population (see Section 2.2, above) resulting from the modifications and technical refinements would not result in a substantial increase in utilization of electricity or natural gas nor would it substantially increase demand for any utility. Similar to the Proposed Plan, the modifications and technical refinements would comply with applicable energy conservation plans and policies of the City and would not result in a wasteful or inefficient use of electricity or natural gas.

Households (occupied housing units) generate demand for utilities; vacant housing units do not generate demand for utilities. The EIR overestimates future demand for utilities from residential use because it compared demand from future housing units and not households to existing household demand. The chart below shows how demand for each utility would change compared to what was evaluated in the EIR assuming no increase in demand from residential use to approximately account for impacts of households rather than housing units and reasonably expected increases to the non-residential square footage. As shown in the chart the increase in demand for each utility would be incremental and would continue to be within the planning assumptions for each utility and therefore modifications to the Proposed Plan would continue to result in less than significant impacts to each utility.

Change in Demand for Utilities – Original Plan Compared to Modified Plan			
Utility	**Original Plan Increase Compared to Existing Conditions**	**Modified Plan Increase Compared to Existing Conditions**	**Percentage Point Increase /a/**
Electricity	28.5%	30.0%	1.5
Natural Gas	26.4%	27.8%	1.3
Water Demand	14.6%	16.2%	1.7
Wastewater Disposal	23.7%	24.4%	0.6
Solid Waste Disposal	25.4%	26.7%	1.3
/a/ Percentages have been rounded and calculation of point change is rounded based on exact numbers.			

While additional housing units may require the construction of additional conveyance infrastructure, the impacts from the modifications and technical refinements would not be different than those analyzed in the Final EIR and would be less than significant. Therefore, the modifications and technical refinements to the Proposed Plan would not result in new significant impacts related to utilities and service systems.

3.0 RESPONSES TO COMMENTS

This chapter of the Final Environmental Impact Report (EIR) contains a summary of all comments received on the Draft EIR and the partially Recirculated Draft EIR (RDEIR) prepared for the Hollywood Community Plan Update (Proposed Project or Proposed Plan) during the public review periods, as well as responses to each of those comments. The responses consist of Master Responses, which address common issues raised in several comments, and individual responses, which address unique issues raised in a single comment letter.

The Los Angeles Department of City Planning (DCP) has evaluated all comments related to physical environmental issues received from public agencies and other interested parties and has prepared written responses to each comment describing the disposition of significant environmental issues raised -- in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. Where appropriate and applicable to potential physical environmental impacts, the basis for incorporating or not incorporating specific suggestions into the Proposed Plan is provided. In each case, DCP has expended a good faith effort, supported by reasoned analysis, to respond to comments. Although some letters may raise legal or planning issues, these issues do not always constitute significant environmental issues. In such cases, specific responses are not provided. While this Final EIR does not respond to these comments, all comments will be reviewed and considered. Some comments will be addressed through revisions to the Proposed Plan and/or in the Staff Report, and all of the comments will be included in the administrative record and forwarded to decision-makers for their consideration in taking action on the Proposed Plan. With respect to comment letters that address both comments on the Proposed Plan and the EIR, the responses in this document may address both comments on the Proposed Plan and the comments that address physical environmental issues.

The City has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts. The City Council finds that all information added to the EIR after publication of the notice of the availability of the Draft EIR for public review but before certification merely clarifies, amplifies, or makes insignificant modifications to an adequate EIR and does not require recirculation. The City Council has based its actions on a full evaluation of all comments in the record of proceedings, concerning the environmental impacts identified and analyzed in the EIR.

3.1 LIST OF COMMENTERS

The Draft EIR was circulated for a 75-day review period which opened on November 15, 2018 and closed on January 31, 2019. During this review period, comment letters relating to the Draft EIR from eight public agencies, 40 groups/organizations, and 13 individuals were received. **Table 3-1** identifies all comments received on the Draft EIR during the public review period. The RDEIR circulated for a 47-day public review period from October 31, 2019 to December 16, 2019. Comments relating to the RDEIR included letters from two public agencies, five groups/organizations, and 41 individuals. **Table 3-2** identifies all comments received on the RDEIR during the public review period.

Each comment letter has been assigned a number. Each comment letter is separated into individual comments, which are numbered. This results in a tiered numbering system, whereby the first comment in Letter 1 is depicted as Comment 1-1, and so on. These numbered comment letters are included in their entirety in Appendix Q. Section 3.3 provides a summary of each comment followed by a response.

TABLE 3-1: LIST OF COMMENTERS ON THE DRAFT EIR			
No.	**Name**	**Organization/Address**	**Date of Letter**
AGENCIES			
1	Miya Edmonson IGR/CEQA Branch Chief	California Department of Transportation (Caltrans) District 7 – Office of Regional Planning 100 S. Main St., MS 16 Los Angeles, CA 90012	January 30, 2019
2	Ali Poosti Division Manager	Los Angeles Bureau of Sanitation (LASAN) Wastewater Engineering Services Division	December 12, 2018
3	Ali Poosti Division Manager	Los Angeles Bureau of Sanitation (LASAN) Wastewater Engineering Services Division	January 31, 2019
4	Georgia Sheridan, AICP Senior Manager	Los Angeles County Metropolitan Transportation Authority (Metro) One Gateway Plaza Los Angeles, CA 90012	January 30, 2019
5	Katy Sanchez Associate Environmental Planner	Native American Heritage Commission 1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691	December 3, 2018
6	Malinda Stalvey Interim Team Manager	Metropolitan Water District of Southern California 700 North Alameda St. Los Angeles, CA 90012	February 4, 2019
7	Scott Morgan Director	Governor's Office of Planning and Research 1400 10th St. Sacramento, CA 95812	February 1, 2019
8	Lijin Sun, J.D. Program Supervisor	South Coast Air Quality Management District 21865 Copley Dr. Diamond Bar, CA 91765	January 30, 2019
GROUPS/ORGANIZATIONS			
9	Mark Vallianatos Policy Director	Abundant Housing LA	January 31, 2019
10		Alliance for Community Transit - Los Angeles Thai Community Development Center	January 31, 2019
11	Jan Martin President/Executive Director	AMDA College and Conservatory of the Performing Arts 6305 Yucca St. Los Angeles, CA 90028	January 31, 2019
12	Robin Greenberg President Nickie Miner Vice President	Bel Air-Beverly Crest Neighborhood Council PO Box 252007 Los Angeles, CA 90025	January 23, 2019
13	David Gajda	Cahuenga Corridor Coalition and EACA Alley Property Owners Association PO Box 1430 Los Angeles, CA 90078	January 21, 2019
14	David Gajda	Cahuenga Corridor Coalition and EACA Alley Property Owners Association PO Box 1430 Los Angeles, CA 90078	January 21, 2019

TABLE 3-1: LIST OF COMMENTERS ON THE DRAFT EIR			
No.	**Name**	**Organization/Address**	**Date of Letter**
15	Jorge Castaneda	Preserve LA 6500 Sunset Blvd. Los Angeles, CA 90028	January 31, 2019
16	Miki Jackson	Preserve LA 6500 Sunset Blvd. Los Angeles, CA 90028	January 31, 2019
17	Shivaun Cooney	Latham & Watkins LLP 355 S. Grand Ave., Ste. 100 Los Angeles, CA 90071	January 31, 2019
18	Laura Lake, Ph.D Secretary	Fix the City	January 30, 2019
19	Alfred Fraijo Jr.	Sheppard Mullin Richter & Hampton LLP 333 Hope St., 43rd Fl. Los Angeles, CA 90071	January 31, 2019
20	Alfred Fraijo Jr.	Sheppard Mullin Richter & Hampton LLP 333 Hope St., 43rd Fl. Los Angeles, CA 90071	January 31, 2019
21	Alfred Fraijo Jr.	Sheppard Mullin Richter & Hampton LLP 333 Hope St., 43rd Fl. Los Angeles, CA 90071	January 31, 2019
22	Don Andres President	Franklin/Hollywood West Residents Association 7470 Franklin Ave. Hollywood, CA 90046	January 30, 2019
23	Frances Offenhauser	Heritage Properties	January 31, 2019
24	Lannette M. Schwartz, MCH	Historic Conservation, LLC 1645 Vine St., Unit 411 Los Angeles, CA 90028	January 31, 2019
25	Rana Ghadban President & CEO	Hollywood Chamber of Commerce 6255 Sunset Blvd., Ste. 150 Hollywood, CA 90028	January 31, 2019
26	Richard Adkins President	Hollywood Heritage, Inc. P.O. Box 2586 Hollywood, CA 90078	January 31, 2019
27	Anastasia Mann President	Hollywood Hills West Neighborhood Council 7095 Hollywood Blvd. P.O. Box 1004 Los Angeles, CA 90028	January 31, 2019
28	George Skarpelos President Jim Van Dusen Chair	Hollywood United Neighborhood Council Certified Neighborhood Council #52 P.O. Box 3272 Los Angeles, CA 90078	January 20, 2019
29	Tara Stephenson-Fong President Alexa Williams Vice President	Hollywoodland Homeowners Association	January 25, 2019
30	Sarajane Schwartz	Homeowners on Beachwood Drive United (HBDU)	January 30, 2019

TABLE 3-1: LIST OF COMMENTERS ON THE DRAFT EIR			
No.	**Name**	**Organization/Address**	**Date of Letter**
31	Sarajane Schwartz	Homeowners on Beachwood Drive United (HBDU)	January 31, 2019
32	Edgar Khalatian	Mayer Brown LLP 350 S. Grand Ave., 25th Fl. Los Angeles, CA 90071	January 28, 2019
33	Lucille Saunders President	La Brea-Willoughby Coalition 843 N. Detroit St. Los Angeles, California 90046	January 30, 2019
34	Doug Haines	La Mirada Avenue Neighborhood Association of Hollywood P.O. Box 93596 Los Angeles, CA 90093	January 30, 2019
35	Jamie T. Hall President	Laurel Canyon Land Trust	January 31, 2019
36	Jamie T. Hall President	Laurel Canyon Association, Doheny-Sunset Plaza Neighborhood Association, Los Feliz Improvement Association, and Nichols Canyon Neighborhood Association	January 31, 2019
37	Jamie T. Hall President	Laurel Canyon Association, Doheny-Sunset Plaza Neighborhood Association, and Nichols Canyon Neighborhood Association	January 31, 2019
38	Adrian Scott Fine Director of Advocacy	Los Angeles Conservancy 523 W. Sixth St., Ste. 826 Los Angeles, CA 90014	January 31, 2019
39	Susan Hunter	Los Angeles Tenants Union Hollywood Local 6500 Sunset Blvd. Los Angeles, CA 90028	January 30, 2019
40	Carol Massie Owner/Operator Hollywood	McDonald's 1413 N. Vine St. Hollywood, CA 90028	January 23, 2019
41	Richard Howard Executive Vice President & Chief Operating Officer	Occidental Entertainment Group Holdings, Inc. 1149 N. McCadden Pl. Hollywood, CA 90038	January 29, 2019
42	Tom Davila President	Outpost Neighborhood Association 7007 Macapa Dr. Los Angeles, CA 90068	January 25, 2019
43	Susan Hunter President	SaveHollywood.Org 2751 Westshire Dr. Los Angeles, CA 90068	January 30, 2019
44	Don Hunt President	South Hollywood Neighborhood Association	January 29, 2019
45	Gregg M. Seltzer Norair Aprahamian Jeff Serber Jeffrey Kavin	7917-7919 W. Sunset Blvd. Los Angeles, CA 90046 7951-7967 W. Sunset Blvd. Los Angeles, CA 90046 8017-8033 W. Sunset Blvd. Los Angeles, CA 90046	January 31, 2019

TABLE 3-1: LIST OF COMMENTERS ON THE DRAFT EIR			
No.	**Name**	**Organization/Address**	**Date of Letter**
46	Casey Maddren President	United Neighborhoods for Los Angeles	January 31, 2019
47	Gideon Kracov	Gideon Kracov 801 S. Grand Ave., 11th Fl. Los Angeles, CA 90017	January 31, 2019
48	Susan Mullins, President Stacy Sillins, Vice President	Upper Nichols Canyon Neighborhood Association	January 31, 2019
INDIVIDUALS			
49	Randy S. Snyder Gary Benjamin	Law Offices of Randy S. Snyder 21333 Oxnard St., 1st Fl. Woodland Hills, CA 91367 Alchemy Planning + Land Use 4470 W. Sunset Blvd., Suite 547 Los Angeles, CA 90027	January 31, 2019
50	Yoni Chriqui		January 31, 2019
51	Orrin M. Feldman, Esq	2733 Woodstock Road Los Angeles, CA 90046-1118	January 29, 2019
52	Mr. & Mrs. Jim Geoghan		January 31, 2019
53	Edward Villareal Hunt, President	The Melrose Hill Neigh borhood Association 4928 West Melrose HillLos Angeles, CA 90029	November 17, 2018 December 17, 2018
54	Ed Hunt		November 18, 2018 November 19, 2018 December 17, 2018
55	J.H. McQuiston	McQuiston Associates 6212 Yucca St. Los Angeles, CA 90028	January 14, 2019
56	Danielle Mead		January 31, 2019
57	Christine Mills O'Brien	2811 Westshire Dr. Hollywoodland, CA 90068	January 30, 2019
58	Tara Stephenson-Fong	3129 Durand Dr. Hollywoodland, CA 90068	January 31, 2019
59	Alexander C. Totz		January 31, 2019
60	Julia Wasson		January 30, 2019
61	Gregory P. Williams		January 29, 2019

TABLE 3-2: LIST OF COMMENTERS ON THE RECIRCULATED DRAFT EIR			
No.	**Name**	**Organization/Address**	**Date of Letter**
AGENCIES			
70	Ali Poosti Division Manager	Los Angeles Bureau of Sanitation (LASAN) Wastewater Engineering Services Division	November 6, 2019
71	Ali Poosti Division Manager	Los Angeles Bureau of Sanitation (LASAN) Wastewater Engineering Services Division	December 17, 2019
117	Scott Morgan Director	Governor's Office of Planning and Research 1400 10th St. Sacramento, CA 95812	December 17, 2019
GROUPS/ORGANIZATIONS			
72	Jim Van Dusen Chair, Planning and Land Use Management Committee George Skarpelos President	Hollywood United Neighborhood Council Certified Neighborhood Council #52 P.O. Box 3272 Los Angeles, CA 90078	December 13, 2019
73	James O'Sullivan	Fix the City	December 14, 2019
74	Richard Howard, Executive Vice President and Chief Operating Officer	Occidental Entertainment Group Holding	December 16, 2019
75	Alfred Fraijo, Jr.	Sheppard Mullin Richter & Hampton LLP 333 South Hope St., 43rd Floor Los Angeles, CA 90071-1422	December 16, 2019
76	Walker Foley, Executive Director Food and Water Watch Gina Martorell, Thai Community Development Center Charlie Carnow, Research Analyst UNITE HERE Local 11 Larry Gross, Executive Director Coalition for Economic Survival Scarlett De Leon ACT-LA Minister Mario Fuentes, Lead Organizer LA Voice Ground Game		December 16, 2019

TABLE 3-2: LIST OF COMMENTERS ON THE RECIRCULATED DRAFT EIR			
No.	**Name**	**Organization/Address**	**Date of Letter**
INDIVIDUALS			
77	Jeanne Clark		November 27, 2019
78	Maureen Tabor		November 30, 2019
79	Alexa A. Williams		December 1, 2019
80	Linda Sollima Doe	3135 Durand Dr. Los Angeles, CA 90068-1613	December 3, 2019
81	Christine Mills O'Brien		November 27, 2019
82	B. Faix		December 6, 2019
83	Jim Krantz.	3055 N. Beachwood Dr. Los Angeles, CA 90068	December 6, 2019
84	Laura Davis	2805 N. Beachwood Dr. Los Angeles, CA 90068	December 6, 2019
85	Tjardus Greidanus	2805 N. Beachwood Dr. Los Angeles, CA 90068	December 6, 2019
86	David Livingston	2750 N. Beachwood Dr. Los Angeles, CA 90068	December 6, 2019
87	Guy Ferland		December 6, 2019
88	Edward Sheftel		December 6, 2019
89	Tinker Lindsay	2805 N. Beachwood Dr. Los Angeles, CA 90068	December 6, 2019
90	Hope Anderson	2800 N. Beachwood Dr. Los Angeles, CA 90068	December 6, 2019
91	Robert Andrus		December 6, 2019
92	Cheryl Veltri		December 6, 2019
93	Paul Martin	2761 N. Beachwood Dr. Los Angeles, CA 90068	December 6, 2019
94	Jay Heit	3177 N. Beachwood Dr. Los Angeles, CA 90068	December 7, 2019
95	Susan Krantz		December 7, 2019
96	TJ Escott	3009 N. Beachwood Dr. Los Angeles, CA. 90068	December 9, 2019
97	Janine Riveire	3109 N. Beachwood Dr. Los Angeles, CA 90068	December 9, 2019
98	James Mykytenko MD, FACS		December 9, 2019
99	Findlay Bunting	2953 N. Beachwood Dr. Los Angeles, CA 90068	December 9, 2019
100	Alison Starr	3020 N. Beachwood Dr. Los Angeles, CA 90068	December 10, 2019
101	Mr & Mrs Richard J. Evans	3156 N. Beachwood Dr. Los Angeles, CA 90068	December 10, 2019

TABLE 3-2: LIST OF COMMENTERS ON THE RECIRCULATED DRAFT EIR			
No.	**Name**	**Organization/Address**	**Date of Letter**
102	David Shew	Wildfire Defense Works 953 School St. Napa, CA 94559	December 10, 2019
103	Anne Marie Coyne-Kashkooli & David Kashkooli	2851 N. Beachwood Dr. Los Angeles, CA 90068	December 10, 2019
104	John W. Schwartz Attorney and Counselor at Law	337 S. Beverly Dr., Suite 211 Beverly Hills, California 90212	December 10, 2019
105	Sarajane Schwartz		December 10, 2019
106	Tony Clark	2933 N. Beachwood Dr. Los Angeles, CA 90068	December 10, 2019
107	Lynne Pateman & Findlay Bunting	2953 N. Beachwood Dr. Los Angeles, CA 90068	December 10, 2019
108	Guy Williams & Victor Zolfo	2845 N. Beachwood Dr. Los Angeles, CA 90068	December 10, 2019
109	Katherine Hartley	2872 Westshire Dr. Los Angeles, CA 90068	December 10, 2019
110	Christine Kent	3204 N. Beachwood Dr. Los Angeles, CA 90068	December 10, 2019
111	Jean Clyde Mason	2777 Woodshire Dr. Los Angeles, CA 90068	December 11, 2019
112	Larry Boring	1428 N. Orange Grove Ave. Los Angeles, CA 90068	December 11, 2019
113	Orrin M. Feldman, Esq.	2733 Woodstock Road Los Angeles, CA 90046-1118	December 15, 2019
114	Brian Dyer		December 16, 2019
115	Danielle Mead		December 15, 2019
116	Valorie Keegan		December 16, 2019

3.2 MASTER RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR AND RECIRCULATED DRAFT EIR

A number of the comments raised common issues; therefore, rather than responding to each comment individually, the following Master Responses have been prepared to provide a single comprehensive response to address issues that were brought up in multiple instances:

- **MASTER RESPONSE NO. 1 – GENERAL COMMENTS AND NON-CEQA ISSUES**
- **MASTER RESPONSE NO. 2 – POPULATION, HOUSING AND EMPLOYMENT**
- **MASTER RESPONSE NO. 3 – HISTORIC RESOURCES**
- **MASTER RESPONSE NO. 4 – INFRASTRUCTURE**
- **MASTER RESPONSE NO. 5 – EMERGENCY SERVICES**
- **MASTER RESPONSE NO. 6 – DISPLACEMENT AND AFFORDABLE HOUSING**
- **MASTER RESPONSE NO. 7 – BIOLOGICAL RESOURCES**
- **MASTER RESPONSE NO. 8 – TRANSPORTATION AND TRAFFIC**
- **MASTER RESPONSE NO. 9 – HILLSIDES**

MASTER RESPONSE NO. 1 – GENERAL COMMENTS AND NON-CEQA ISSUES

Summary of Master Response

- **Lead agencies need only respond to comments related to significant environmental issues associated with a project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204).**
- **Detailed responses are not necessarily provided for comments that do not relate either to 1) significant environmental issues, or 2) adequacy of the analysis in the EIR; other issues raised by comments are generally addressed outside the CEQA process (CEQA Guidelines Sections 15088 and 15204).**
- **Opinions regarding significance of environmental issues already addressed in the EIR without additional substantial evidence in support of the opinions(s) do not require a response.**
- **Comments regarding topics not addressed by CEQA (for example socio-economic issues that do not result in physical environmental impacts) are not addressed as part of the CEQA process.**
- **The EIR is not intended or required to provide justification for a Proposed Plan nor is it a vehicle for making changes to the Proposed Plan with respect to the land use designation of individual properties absent the proposed change reducing one or more identified significant adverse environmental impact. Rather, the EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that a Proposed Plan is likely to have on the environment. Comments regarding suggested changes to the Plan are not addressed in detail as part of the CEQA process unless such changes could result in reducing or avoiding a significant adverse environmental impact.**
- **Expressions of opposition or support for the Proposed Plan, are made a part of the administrative record and forwarded to the decision-makers for their consideration in taking action on the Project, but they require no further response.**

Summary of Unrelated or Unsupported Comments under CEQA

The City is required to provide written responses to comments that raise significant environmental issues. Many comments raise issues that are important to the decision-making process but are not required to be properly addressed as part of the CEQA process, that is they do not raise significant environmental issues. Such Comments do not require a response in the Final EIR and generally have not been responded to in the Final EIR. These include comments that:

- Suggest changes to all or part of the Proposed Plan unrelated to significant environmental issues, including the adequacy of the EIR's analysis of significant environmental impacts.
- Express of support or opposition to the Proposed Plan that do not relate significant environmental issues, including the adequacy of the EIR's analysis of significant environmental impacts.
- Raise concerns or ask questions with specific features or provisions of the Proposed Plan that do not relate to significant environmental issues.

In addition, several commenters provided comments that raise significant environmental issues, such as those that challenge the adequacy or correctness of the information, analysis and/or conclusions in the EIR, including identifying impacts as significant, but the comments do not provide substantial evidence to support the comment, including because the comments are too general. Substantial evidence is defined as: "fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact." (Public Resources Code (PRC) Section 21080(e)(1). Substantial evidence is not "argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. (PRC Section 21080(e)(2).) The City is not required and does not provide a detailed response for comments lacking substantial evidence. CEQA Guidelines Section 15088(c)

provides: the level of detail contained in the lead agency's response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general).

Response

Purpose of EIR and EIR Process

CEQA's statutory framework sets forth a series of analytical steps intended to promote the fundamental goals and purposes of environmental review – information, participation, mitigation, and accountability. The purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect that a project is likely to have on the physical environment, to list ways in which any significant adverse effects might be minimized, and to indicate alternatives that reduce any identified adverse impacts (PRC Section 21061). Thus, the purpose of this EIR is to evaluate potential impacts on the environment resulting from the Proposed Plan, identify the significant impacts, describe feasible mitigation measures which could minimize significant adverse impacts, and describe a reasonable range of alternatives that would avoid or substantially lessen significant environmental impacts while attaining most of the basic objectives of the Proposed Plan (CEQA Guidelines Sections 15126.2, 15126.4, 15126.6.). Pursuant to the California PRC Section 21091(d), the Department of City Planning considered all comments received on the Draft EIR and this document provides written response describing the "disposition of each significant environmental issue that is raised by commenters." CEQA Guidelines Section 15088 provides further guidance on the preparation of response to comments and indicates that while lead agencies must evaluate all comments received on a Draft EIR they need only respond to comments related to significant environmental issues. CEQA Guidelines Section 15204 further provides that lead agencies in responding to comments do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR. CEQA Guidelines Section 15204 recommends that commenters focus on the sufficiency of the EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Section 15204 further indicates that commenters should provide an explanation and evidence supporting their comments. An effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion (CEQA Guidelines Section 15064). CEQA case law has held that lead agencies are not obligated to undertake every suggestion given to them and are also not required to conduct every test or perform all research, study, and experimentation recommended by commenters (CEQA Guidelines Section 15204). Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency based on substantial evidence in the record.

Adequacy of Analysis

The focus of the City's responses to comments received on the Draft EIR is the "disposition of significant environmental issues raised" in the comments (CEQA Guidelines Section 15088(c)). Detailed responses are not necessarily provided for comments that do not relate either to significant environmental issues or adequacy of the analysis in the EIR. This includes comments that raise issues that are not environmental impacts as identified by CEQA (e.g., property values and other socioeconomic concerns), or relate to unsupported opinions regarding the adequacy of the EIR analysis and/or the EIR's findings of significance.

CEQA Guidelines were recently amended to reflect recent case law to clarify that CEQA, with limited exceptions, is focused on the analysis of impacts of the project on the environment and not impacts of the existing environment on the project.[1] So for example, impacts from air pollution from a freeway on future residents of project being constructed next to the freeway are only CEQA impacts if the project exacerbates the existing

[1]California Supreme Court's decision in *California Building Industry Association v Bay Area Air Quality Management District*, S213478, December 17, 2015 and California Court of Appeals decision in *California Building Industry Association v Bay Area Air Quality Management District*, August 12, 2016.

freeway conditions and that will result in an impact to the future residents. That is not to say that freeway pollution is not concerns to be addressed in the planning process, they are just addressed outside the CEQA process.

The analysis in the Hollywood Community Plan Update EIR is based on scientific and factual data which has been reviewed by the lead agency and reflects its independent judgment and conclusions. CEQA permits disagreements between experts with respect to environmental issues addressed in an EIR. As stated in Section 15151 of the CEQA Guidelines, disagreement among experts does not make an EIR inadequate. The courts have looked not for perfection but for adequacy, completeness and a good faith effort at full disclosure.

Comments on Plan

The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the Hollywood Community Plan Area, consistent with the growth strategies of the City as outlined in the City's General Plan Framework Element, as well as the policies of Senate Bill (SB) 375 and the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In general, the Proposed Plan aims to maximize development opportunities around existing transit hubs and corridors and encourage a better balance of jobs and housing with mixed-use development while preserving single-family neighborhoods, hillsides, and open space areas. The Proposed Plan seeks to balance increasing density around transit consistent with State, regional and local polices, with environmental impacts, as well as other community concerns.

This EIR is not intended or required to provide justification for the Proposed Plan. Rather, the EIR is an informational document that is intended to provide public agencies and the public with detailed information about the effect that the Proposed Plan is likely to have on the environment. This EIR also identifies ways in which the significant effects of the Proposed Plan might be minimized and identifies alternatives to the Proposed Plan. The EIR is not a vehicle for making changes to the Proposed Plan with respect to the land use designation or zoning designation of individual properties and the City is not required to consider such a request in its CEQA analysis absent a commenter providing substantial evidence that the proposed change would feasibly reduce one or more significant adverse environmental impact identified in the EIR. Requests for changes to the Proposed Plan on individual properties may be addressed through the planning process outside of the CEQA process.

Opinions and General Support for, or Opposition to, the Project

Many commenters expressed their opinion in support of, or in opposition to, the Proposed Plan in whole or in part. While the City welcomes all comments, opinions and expressions of opposition or support unrelated to physical environmental impacts, these comments are appropriately addressed outside the CEQA process. The purpose of the EIR is to present objective information as to the Proposed Plan's potential physical environmental impacts. The purpose of allowing the public and agencies to comment on a Draft EIR is to allow any errors to be identified and corrected. Opinions concerning issues not addressed by CEQA, including expressions of opposition or support for a project, are made a part of the administrative record and are forwarded to the decision-makers for their consideration in taking action on the Project, but they are not responded to in a CEQA document.

Conclusion

This EIR properly discusses, analyzes, and provides information regarding all physical environmental issues that could be impacted by the Proposed Plan. While some explanatory or informational responses have been provided for some comments not raising significant environmental issues, generally comments that do not address significant environmental issues will largely be addressed through revisions to the Proposed Plan or in discussion in the CPC-2016-1450-CPU Staff Report. Those that are not responded to, along with all comments will be shared with the decision-maker prior to final approval of the project. Therefore, in accordance with PRC Section 21091 and CEQA Guidelines Sections 15088 and 15204, there is no basis for additional analysis and no further response is required.

MASTER RESPONSE NO. 2 – POPULATION, HOUSING AND EMPLOYMENT

Summary of Master Response

- **The 2016 Baseline is supported by substantial evidence, as described in the discussion of multiple sources of data verification that include SCAG's 2016 RTP/SCS, the 2020 RTP/SCS, and other best available sources of demographic data such as the U.S. Census Bureau.**
- **The Proposed Plan's reasonably expected development exceeds SCAG's 2016 RTP/SCS projections for the year 2040 to better align with the City's growth policies and objectives, based on factors such as the availability of transit infrastructure, directing growth near transit systems, and sustainable development trends.**
- **The Proposed Plan's reasonably expected development considered State Density Bonus, the Transit Oriented Communities (TOC) Guidelines, the Hollywood CPIO affordable housing incentives, and Accessory Dwelling Units (ADU) as part of the impact analysis.**
- **Overall vacancy rates in the CPA have fluctuated in recent years but the renter vacancy rate is relatively stable in the Community Plan Area, which is primarily composed of renters.**
- **The Proposed Plan is a long-term policy plan with zoning implementation that addresses a number of planning topics, such as housing, mobility, employment, and climate change, consistent with State objectives, regardless of fluctuations in population numbers.**

Summary of Comments

A number of comments raise concerns or present arguments that the numbers used in the EIR for population and housing in the baseline year (2016), in the projected growth year 2040, and the Proposed Plan's reasonably expected development (2040) are not supported with substantial evidence. Comments received have variations of this overall concern, and the specific concerns are summarized in the next paragraph.

A few comments state that the Community Plan Area (CPA) showed a decline in population in the 2010 Census and the 2000 Census, and is not significantly growing or may not be growing and that the 2016 baseline housing and/or population data are inaccurate. A few comments note that vacancy rates are high in the CPA. Several comments note that there is overreliance on the Southern California Association of Governments (SCAG) demographic data for the 2016 baseline year and the 2040 horizon year. Some comments ask if and how density bonus incentives, including Transit Oriented Communities (TOC), and Accessory Dwelling Units (ADU), are included in the reasonably expected housing; a few comments express concern that the build-out of these housing incentives was not analyzed. Several comments also state that the Proposed Plan's reasonably expected housing and population figures substantially exceed the growth projected by the SCAG for the CPA in 2040, and express concern about the methodology used and the proposed increases to zoning. Some commenters said that the Proposed Plan is not needed or justified because growth can continue to occur under the 1988 Hollywood Community Plan.

Some comments implicate concerns related to the adequacy of the EIR analysis and some comments implicate policy concerns. To the extent these comments address the environmental issues and the adequacy of the EIR pursuant to the requirements of CEQA, the City provides this master response.

Response

Introduction

One of the primary objectives of the Proposed Plan is to accommodate and plan for future anticipated population, housing, and employment growth to the year 2040. The Proposed Plan has a mix of land use designation amendments and zone changes, some of which would allow additional housing and jobs and some of which would limit development potential for improved compatibility within neighborhoods. Proposed zone changes that would limit development potential are generally new height limits and density limitations for historic preservation and maintenance of neighborhood scales, based on community input. In

addition, because the existing Hollywood Community Plan was last adopted in 1988, there are a number of consistency corrections to zoning and land use, including from the implementation of the Vermont/Western Station Neighborhood Area Plan, a transit-oriented specific plan in effect since 2001.

The areas where additional development is being directed were selected near existing transit systems generally in central Hollywood and along major corridors served by bus lines, and away from low-density residential neighborhoods, consistent with the guidance of the City's General Plan Framework Element. A few of the Framework's key guiding principles are to grow strategically, conserve existing low-density residential neighborhoods, and improve mobility and access. The relationship between the Proposed Plan and the Framework Element's guiding principles is discussed on pages 4.10-19 to 4.10-21 in Section 4.10 of the EIR. Planning housing, jobs, and visitor-serving uses, such as regional attractions, restaurants, and retail near available transit systems promotes the use of non-vehicular mobility, and is a strategy for reducing total vehicle miles traveled, which helps improve sustainability and air quality. Please see **Master Response No. 8 – Transportation and Traffic** for more information about vehicle miles traveled.

The EIR analyzes environmental impacts associated with population, housing, and employment in Section 4.13, and concludes that each of the impacts analyzed under this topic would be less than significant and therefore, no mitigation measures are required. The numbers used for housing and population analysis in the EIR are described in Appendix B, Methodology. Some comments received for population and housing do not address the impact conclusions in Section 4.13 but rather raise other questions, including the source and accuracy of the baseline and projected housing and population numbers and the Proposed Plan's reasonably expected development numbers for housing and population. The responses are provided below.

2016 Baseline

CEQA Guidelines Section 15125(a) provides the general rule for baselines:

> *An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which the Lead Agency determines whether an impact is significant. The description of the environmental setting will normally constitute the baseline conditions by which a Lead Agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*
>
> ...
>
> *(1) Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published . . . .*

Population, housing and employment is a portion of the physical environmental setting described for an EIR, including others such as, the built environment (e.g., building heights, valued aesthetic resources, and public infrastructure), and the natural environment (e.g., air quality, watershed, the natural scenic resources, wildlife), and other physical characteristics (e.g., average vehicle trips, ambient noise characteristics, public services provided). The City, like most lead agencies, uses the Appendix G questions in the CEQA Guidelines to determine if its projects result in significant impacts to the environment. Population, housing and employment, as an environmental setting is relevant and used in the following impact sections to analyze impacts: air quality, greenhouse gas (GHG), energy, transportation, noise from mobile sources, population, housing and employment, utilities and public services (including recreation). The City published the Notice of Preparation (NOP) for the Proposed Plan in April of 2016.

SCAG is designated as a Metropolitan Planning Organization (MPO) responsible for carrying out federal and statutory duties within its six-county region, which includes Los Angeles County. SCAG is responsible for producing socio-economic estimates and projections, and the data is used in SCAG's RTP/SCS. The 2016-2040 RTP/SCS envisioned growing more compact communities in existing urban areas with efficient public transit and safe mobility opportunities. Major policy themes include integrating transportation investments and future land use patterns, striving for sustainability, providing more transportation choices, and supporting economic growth with infrastructure. Many municipalities and government agencies utilize the most recently adopted SCAG RTP/SCS data for purposes of planning, which for the preparation and analysis of the Proposed Plan was the 2016-2040 RTP/SCS. It is Los Angeles City Planning's practice to use SCAG RTP/SCS demographic data as a benchmark or as a reference point for recent estimates and projections locally; many other agencies and jurisdiction also use SCAG demographics data to plan for local change and growth.

As stated above, the NOP for the Proposed Plan was released in April 2016, and therefore the adopted 2016-2040 RTP/SCS was used to reference housing and population data for 2016 (the baseline year) and 2040 (the horizon year). For this RTP/SCS, SCAG utilized demographic data (households, population, and employment) from a baseline year of 2012 and makes projections for 2040. To address the time gap between 2012 and 2016, the demographic data from 2012 were interpolated to estimate 2016 existing conditions, as stated in Appendix B. The estimated 2016 population was approximately 206,000 persons. Annual demographics data are not immediately available and there is usually a lag time in the data release, as noted in Appendix B. Therefore, the interpolated population numbers using an annual average growth rate represented the most reasonable estimate available in 2016. In late 2017 during the preparation of the EIR, the Census Bureau's 2016 American Community Survey (ACS) 5-year data was released, and is presented in Appendix B. The ACS data indicated a population of 203,000, or an approximately one percent difference between the interpolated SCAG population estimate and the ACS population estimate for the CPA.

Published demographic data is widely available, including from private companies and university researchers, but they are usually for specific purposes, such as market research or academic publications. Each one has their own methodologies and assumptions but often, the data involves using Census Bureau products, including the decennial census count and ACS estimates of socioeconomic characteristics. There are limited, official demographics data available from government agencies, namely the Census Bureau and locally, SCAG for the region it serves. In addition to preparing the RTP/SCS, SCAG publishes local profile reports for each city in its jurisdiction, once every two years. Other MPOs have their own demographic data. There are also specific federal or state government agencies that publish more topical demographics data, such as employment, labor, agriculture, health/disease, and education/children. Demography is a specialized field of study, and technical expertise is required to calculate models and growth forecasts/projections. Demographics data produced by SCAG and the Census Bureau is used because they are the best available sources.

A few comment letters have pointed to other potential data sources such as the Hollywood Chamber of Commerce regarding how many multi-family housing units have been built, and that they seem to show a higher number than the net housing units suggested by the SCAG and/or ACS data between 2000 and 2016. The comment states that supposedly nearly 5,000 multi-family units had been completed. Since the Hollywood Chamber of Commerce report was not provided in Comment Letter 15 and the methodology is unknown, the comment does not provide substantial evidence for the commenter's assertion. For example, it is unknown whether the report count of multi-family units was based on filed entitlements, approved entitlements, building permits, or units that have received a certificate of occupancy. In addition, approved projects may not get built immediately as it may take time to secure funding for construction. City Planning was not able to locate a copy of the report online. Without knowing the details of what was published and only seeing the comment letter, the City rejects that report as a source of data for the baseline conditions and chooses to rely on data estimates provided from demographics experts, i.e. SCAG and the Census Bureau.

Another Comment Letter, No. 43, suggests that the EIR did not consider entitled projects, because if it did, then the CPA would have the 10,000 units needed for the population growth anticipated by the Proposed Plan for 2040. First, the Proposed Plan's reasonably expected development exceeds 10,000 units and second, it is unclear what is the source of the 10,000 units mentioned in the comment letter. In 2019, City Planning released a Housing Progress Dashboard to show the City's housing pipeline information dating back to 2015. Using this tool to show the number of units entitled in the CPA in 2016, including from the year 2015, the total number is approximately 4,700 units; the number was approximately 8,700 units through 2018, the year the EIR was released. It should be acknowledged that entitled units are not the same as built units because some entitled projects may undergo additional changes that require new approvals or may not get built in time, in which case the entitlement expires and the zoning reverts back to the underlying zone prior to the entitlement. Nonetheless, the EIR analyzed a net increase of approximately 28,000 occupied housing units compared to the 2016 baseline of 104,000 units, exceeding the amount mentioned in the comment letter. The comment does not raise significant new information nor does it change the impact conclusions in the EIR.

During the preparation of the Final EIR, SCAG adopted Connect SoCal (2020-2045 RTP/SCS) in 2020. The latest adopted RTP/SCS used a baseline year of 2016. For the Hollywood CPA, SCAG utilized a 2016 estimated population of approximately 203,000 persons. As noted above, this difference is approximately one percent from the estimated 206,000 persons in the Proposed Plan's EIR baseline. As time has passed, additional demographics data have been released by the ACS, which is published by the U.S. Census Bureau. The ACS is a nationwide social, economic, housing, and demographics survey that focuses on the characteristics of the population, not to provide counts of the population[2]. Each month approximately 295,000 randomly selected addresses receive requests to complete questionnaires out of more than 140 million eligible addresses; this represents about two percent of all addresses. From these responses and in person surveys, as needed when households do not provide responses, data is collected and analyzed to inform the demographic estimates. There are uncertainties within the sample data, including sampling error.

The most recent 2019 ACS 5-year data released in 2020 shows an increase in housing units (approximately 108,000) for Hollywood but a lowered population number (approximately 196,000). The data may imply a population decline post the baseline year but population data are dynamic and change over time[3]. It should be noted however that the ACS cautions against comparing ACS data when there is an overlapping time period[4], such as in this case; the 2016 ACS covered the years 2012-2016 whereas the 2019 ACS covered the years 2015-2019. This is because using pooled data from overlapping time periods to look for trends may be challenging for multi-year estimates, but comparing 5-year estimates that do not overlap is acceptable. In general, slowing growth over the past decade is a trend acknowledged by demographers but there has not been any projections or discussions of stagnant growth or loss in California or the SCAG region. Expert demographers have presented data in the last few years during SCAG's Annual Demographic Workshops affirming that population will continue to grow in the state and in the SCAG region over the next few decades but at slower rates than in past decades[5].

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[2] U.S. Census Bureau, *Understanding and Using American Community Survey Data: What All Data Users Need to Know* (2020); https://www.census.gov/content/dam/Census/library/publications/2020/acs/acs_general_handbook_2020.pdf, accessed June 15, 2021.

[3] In 2010, the population in the Hollywood Community Plan declined by about six percent when comparing the 2000 Census data to the 2010 Census data, which captured changes as a result of the Great Recession. In 2016, population was estimated to have increased compared to 2010.

[4] U.S. Census Bureau, *Understanding and Using American Community Survey Data: What All Data Users Need to Know* (2020); https://www.census.gov/content/dam/Census/library/publications/2020/acs/acs_general_handbook_2020.pdf, accessed June 15, 2021.

[5] SCAG, *Annual Demographic Workshop: See presentations* available on https://scag.ca.gov/demographics and https://scag.ca.gov/past-demographic-workshops, including from the State Department of Finance.

Overall, looking at the population data going back to the 2010 U.S. Census shows that population fluctuates, going up or down based on various factors, such as the Great Recession (December 2007 – June 2009, and potentially the COVID-19 Pandemic. At the time of preparation of this Final EIR, the 2020 U.S. Census is anticipated to have a "legacy format" release in mid-August 2021 that requires additional software and expertise to extract the data and the final release in late September 2021 to the full public in user-friendly format. The 2020 U.S. Census may show that the Plan Area has the population used in the DEIR, a greater population, the population the latest ACS survey shows, or has had an additional loss in population. There are some reasons to be concerned about the reliability of the 2020 U.S. Census. First, it was undertaken during a global pandemic, which resulted in many people losing their jobs, needing to telecommute, and being quarantined or following Safer at Home orders, and even some people, tragically getting very sick and dying. Second, there have been concerns with the potential impact on responses to the Census based on the Trump Administration's widely publicized attempt to put a citizenship question on the Census. Ultimately, whether the 2020 U.S. Census indicates an additional population decline or the population in the 2020 U.S. Census is consistent with the latest ACS Survey of around 196,000 people, or population is greater, evidence shows that population fluctuates. CEQA Guidelines Section 15125(a)(1) provide the following when conditions fluctuate:

> *Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence.*

The City finds that using the 2016 baseline of 206,000 people provides the most accurate picture practically possible for all the following reasons: (1) it was supported with substantial evidence when the City released the NOP based on the best available data source at the time, the 2016 RTP/SCS, (2) the ACS Survey and the 2020 RTP/SCS (which used the 2016 population figures) showed the 206,000 figure was within one percent of their population number of 203,000, (3) and the project is a 20 plus year plan, which is likely to experience population fluctuations, but substantial evidence supports that the population is anticipated to increase over time based on evidence from Department of Finance (DOF), the SCAG Annual Demographic Workshop presentations, and historical data, including the most recent population growth between the 2010 Census and the 2016 conditions. The temporary population decrease from the Great Recession came back in 2016. Based on the above, the City finds it is reasonable to assume that a population drop being experienced right now will be temporary.

To the extent that the 2020 U.S. Census shows a greater drop in population than the ACS Survey, the City does not find that is a basis to adjust the baseline in the EIR. The 2020 COVID-19 pandemic is a worldwide pandemic that has resulted in extraordinary conditions, including a complete shut-down of schools, businesses and other public gathering places in the Plan Area, the City, State and the Nation. Most people were effectively quarantined at home and telecommuting. Many people lost their jobs. Anecdotal evidence supports that many people moved back to live with family or other situations where they did not need to pay rent or moved as telecommuting became available. A Pew Research Center survey in 2020 indicated that about a fifth of adults either moved due to COVID-19 or knew someone who moved; the survey results attributed the reasons directly to the pandemic outbreak or pandemic-related reasons, such as job losses or the shutdown of college housing or people who wanted to be with family.[6] The U.S. Census Bureau has been conducting a Household Pulse Survey since August 2020 to capture socioeconomic data during the pandemic, and found more than one third of workers (36.9 percent) were telecommuting between August 2020 and December 2020.[7] It is unclear at this point in time what will happen in the next few years.

[6] The Pew Research Center, https://www.pewresearch.org/fact-tank/2020/07/06/about-a-fifth-of-u-s-adults-moved-due-to-covid-19-or-know-someone-who-did/, accessed July 23, 2021.

[7] U.S. Census, https://www.census.gov/library/stories/2021/03/working-from-home-during-the-pandemic.html, accessed July 28, 2021.

Therefore, the only reliable evidence for what truly represents population in the Plan Area is the data the City has from reliable expert sources during normal conditions. CEQA recognizes that conditions may change during the preparation of an EIR and that is why it has established the general rule that the baseline should be the existing physical conditions at the time of the publication of the NOP. Therefore, CEQA supports the City's reliance on the existing conditions at the time the NOP was released for the Proposed Plan. Substantial evidence supports that the population was 206,000 based on the 2016 RTP/SCS and the 2020 RTP/SCS. The City rejects changing the baseline to the latest ACS Survey or the pending 2020 U.S. Census because of the strong evidence that population fluctuates and relying on existing conditions in 2016 provides the most accurate picture practically possible of the project's impacts.

Moreover, starting over with the preparation of a new EIR with a baseline that reflects 2021 population estimates will not solve the problem as Plan level EIRs require several years to complete and by the time this new EIR would be released for public comment and/or certification, the population estimates may have fluctuated again. This further delays the adoption of a Community Plan that is intended to facilitate important local and state goals of accommodating needed housing, reducing per capita GHG emissions and VMT.

Planning for Hollywood's 2040 Future Consistent with City and SCAG Objectives

The City's policy when updating Community Plans is to meet or exceed SCAG's projections for the horizon year. City Planning considers SCAG projections as targets when updating long-range community plans. In some cases, Community Plan updates exceed SCAG's future projections depending on the availability of transit infrastructure, development trends, and consistency with the City's growth policies. Since the 1970s, the City has envisioned and designated Hollywood as one of the regional centers of the City for housing, population, and employment. Hollywood is centrally located in the City. In 1999, a portion of the Metro B (Red) Line from the Wilshire/Vermont station to the Hollywood/Vine station opened and in 2000, the Hollywood/Vine portion to North Hollywood opened. Since then, transit-oriented development has been active in the CPA, and new mixed-use buildings and media offices have been erected in the last five years. The Proposed Plan accommodates more population, housing, and employment than SCAG's projections for 2040 because the City has made a policy decision to direct growth near existing transit infrastructure. Central Hollywood has been and remains a prime location for transit-oriented development with five Metro subway stations and other Metro bus routes adjacent to parcels on corridors that can be used for infill development to provide additional housing and jobs. Billions of dollars of investment in Los Angeles transit infrastructure continues to provide opportunities for integrating transportation and land use planning in Hollywood and other Community Plan Areas.

The Proposed Plan's reasonably expected housing, population, and employment for the year 2040 compared to SCAG's projections are shown in Table 3-4 on page 3-17 and discussed in Chapter 3.0, Project Description. Additional discussion is also provided in **Chapter 2.0, Modifications and Technical Refinements to the Proposed Plan and Environmental Effects**, of the Final EIR. Please see Appendix B, pages 9-10, for discussion of reasonably expected development. The Proposed Plan has a range of reasonably expected housing units and population to account for development potential associated with optional affordable housing incentive programs; the upper range is based on development conditions where applicants are utilizing incentive programs with more frequency, as discussed in Appendix B. Using the upper range of the Proposed Plan's reasonably expected development, the figures compared to SCAG's would be approximately 17 percent higher for housing and population. The higher percentage considered under the Proposed Plan is due to the additional incentive housing units and accessory dwelling units that could be built. Using the lower range of the Proposed Plan's reasonably expected development, the Proposed Plan's figures compared to SCAG would be approximately 7 percent higher for housing and population.

The housing incentive programs considered under the Proposed Plan were State Density Bonus, TOC, the Hollywood CPIO, and Accessory Dwelling Units (ADU). The use of Density Bonus has been fairly limited in the Hollywood CPA, based on the general review of biweekly case reports for entitlements filed and planner knowledge about development in the area. Prior to the effective date of the TOC program, use of

Density Bonus was roughly five percent. During the time that the Proposed Plan's EIR was being prepared, the TOC program went into effect (September 2017) and the ADU ordinance was being drafted (later adopted in 2019). Initially, there was little use of the TOC program in the Hollywood CPA but an estimate had to be made to account for a reasonable use of affordable housing programs and the anticipated ADU program. It was decided that a 10 percent utilization of optional affordable housing and the ADU programs was reasonable, as five percent may be too low based on the additional incentives allowed under the TOC program. The build-out of all housing incentive programs, meaning that 100 percent of properties would redevelop or develop with affordable housing or ADU in the next 20 years, was not analyzed because that is not a reasonable scenario. A range of housing units and population numbers was provided in the EIR to account for the 10 percent utilization explained here, which is reflected in the higher end of the reasonable expected development range. The high range was analyzed in the EIR; these numbers are presented in several appendices (Appendix F – Air Quality, Appendix G – Greenhouse Gas Emissions, Appendix I – Utilities, and Appendix J – Hollywood Model Development Report).

The CPA's Reasonably Expected Development, which is determined based on a number of factors, as described in Appendix B is supported with substantial evidence. First, similar to the discussion above, to the extent there has been a population decrease based on the latest ACS survey or the 2020 U.S. Census, while it may indicate a possibility that the City will not grow as much as the 2016 and 2020 SCS/RTP's forecast, it does not provide enough information to indicate these expert forecasts as not credible. The City has no other reliable source for the anticipated growth in population for the City. Approximately nine percent of the City's projected population growth is reasonably expected to occur in the Hollywood Plan Area by 2040. The City is proposing zoning and land use changes that will put that percentage in the Hollywood Area. The Reasonably Expected Development from the Proposed Plan is based on looking at the proposed land uses and density, market factors, historical growth patterns as described in Appendix B, Methodology.

DCP uses a methodology based on land use and zoning standards to determine the Reasonable Expected Development. Assumptions are made about the level of build-out that is likely or reasonably expected to occur in a Community Plan Area based on factors including the acreage of land designated for each type of land use (by General Plan Land Use designations); allowable densities and intensities in each designation; and anticipated levels of development during the planning horizon based on professional expertise that may include consideration of past and existing development patterns, entitled and proposed project trends, underutilized areas, and available transit infrastructure. The latter are subject to changes during the preparation of the Proposed Plan and therefore estimates of Reasonable Expected Development may be refined over the course of the project.

Ultimately, market factors dictate the level of development that occurs. Experience shows that only a percentage of the properties within a CPA will be redeveloped within the horizon year, typically 20 - 25 years, and that even the sites that do redevelop are not always developed to maximum levels allowed by the zoning. For this reason, 100 percent build out is a theoretical scenario and is not analyzed, but rather a more "realistic" reasonable expected level of development is used both to guide proposed land use changes and analyze the potential environmental impacts of those changes. A number of factors serve to constrain development, including:

- Physical site constraints (topography, geology, etc.)
- Zoning regulations (requirements for parking, open space, yards, setbacks and height that sometimes limit the maximum development on a site to levels below what the zoning would otherwise permit)
- Environmental factors and constraints (adjacent uses, sensitive uses, local, state and federal laws)
- Historic preservation goals and regulations
- Historical development patterns
- Land values, property ownership
- Market factors, (economy, financial lending practices, etc.)
- Community input and public participation process, among others

DCP considers these factors in using its best judgment, based on the education, experience and knowledge of its City Planners, to determine the Reasonably Expected Development for the Proposed Plan.

In developing the Reasonably Expected Development, the planning team for the Plan Update researched substantial data sources to understand the Plan Area at the block-by-block level, including reviewing Los Angeles County Assessor data, planning entitlements, building permit and use permit research, and driving and walking the Plan Area. After they have finished pulling the data, the planners review the Plan Area and, in some cases, parcel by parcel, to make judgment calls together based on the above factors along with the proposed land use and zoning designations and assess what the reasonably expected development will be relying on experience, training, and knowledge. Utilizing its collective expertise, the Community Planning team make and apply assumptions to the land acreage within the Community Plan Area to determine the amount of residential units and non-residential square footage that could be built during the life of the Plan. For example, residential land area is multiplied by dwelling units per acre to generate an assumed dwelling unit count, and non-residential land area is multiplied by development potential, applying industry standards of employment density to calculate the total number of employees.

Based on all of the above, the Reasonably Expected Development is supported with substantial evidence of the expert opinion of the City's planning staff, with collective experience of several decades working in planning for the City of Los Angeles, relying upon the Proposed Plan's zoning and land use, the existing physical conditions in the Plan Area, and the other factors described above.

Vacancy

A few comments noted that vacancy rates seem to be high in the Community Plan Area. The ACS provides data on housing occupancy and vacancy, and whether the housing unit is occupied by owners or renters. The overall vacancy rate was approximately 8.1 percent in the 2010 Census, and the most recently available 2019 5-year ACS data indicates the rate is approximately 13.1 percent. In comparison, the ACS indicates that the overall vacancy rate Citywide is approximately 7.3 percent during the same multi-year estimate. Vacant units include ones where the owners live somewhere else and units that appear to be constructed but may have not started leasing yet[8]. Central Hollywood has seen multiple new apartment buildings under construction and open up in the past five years. A working paper from the UCLA Lewis Center for Regional Policy Studies suggests that increases in vacancy rates reported in Downtown Los Angeles is from the increased construction of large new buildings when they open up for the first time, but after these new buildings have been open for more than one year, their vacancy rates stabilized.[9]

Hollywood has an above average percentage of renters compared to the Citywide average. In Hollywood, approximately 80 percent of housing units are multi-family units. Because of the large number of renters in Hollywood and the ongoing housing affordability crisis, the vacancy rate of rental units is the significant metric to focus on instead of the overall vacancy rate. In recent years, 5-year ACS data[10] released between 2017 and 2020 and analyzed by the Los Angeles City Planning Demographics Research Unit indicate that the renter vacancy percentage in the Hollywood CPA has ranged from approximately 3.2 percent to

[8] A housing unit is vacant if no one is living in it at the time of the interview, unless its occupants are only temporarily absent. In addition, a vacant unit may be one which is entirely occupied by persons who have a usual residence elsewhere. New units not yet occupied are classified as vacant housing units if construction has reached a point where all exterior windows and doors are installed and final usable floors are in place. Vacant units are excluded if they are exposed to the elements, that is, if the roof, walls, windows, or doors no longer protect the interior from the elements, or if there is positive evidence (such as a sign on the house or block) that the unit is to be demolished or is condemned. Also excluded are quarters being used entirely for nonresidential purposes, such as a store or an office, or quarters used for the storage of business supplies or inventory, machinery, or agricultural products. U.S. Census Bureau, Definitions and Explanations, https://www.census.gov/housing/hvs/definitions.pdf, accessed June 11, 2021.

[9] Phillips, S. (2020). Does the Los Angeles region have too many vacant homes? UCLA: The Ralph and Goldy Lewis Center for Regional Policy Studies. Retrieved from https://escholarship.org/uc/item/87r4543q

[10] 2016 ACS 5-year data, 2017 ACS 5-year data, 2018 ACS 5-year data, and 2019 ACS 5-year data, Los Angeles City Planning, Demographics Research Unit.

4.8 percent, although as noted earlier, comparisons for trends should not be made for data that have overlapping years. The percentages are being shared for informational purposes only. Citywide, for the same time period, the renter vacancy percentage has been between 3.4 percent and 3.7 percent. A variety of studies and real estate or housing articles have referred to a five percent or above five percent vacancy rate as an indicator of a healthy or "tenant friendly" housing market, that low vacancy rates are good for landlords but higher vacancy rates are good for renters in terms of having housing options.[11]

Planning for Change Consistent with State Objectives

Preparing for change in the decades ahead is an effort guided by achievable goals, policies, and programs in each CPA; long-range planning is undertaken by all jurisdictions and is mandated whether a community is growing or undergoing population decline. SCAG has discussed the need to plan for an improved future that is sustainable regardless of indications of slower growth. Each city and county in California is required by state law to adopt a general plan, which expresses each community's development goals and public policies relative to the distribution and development of future land uses, and implementing zoning ordinances are required to conform to such general plans. The general plan has mandated elements, including Land Use, Circulation and Housing. In the City of Los Angeles, the 35 Community Plans make up the City's Land Use element.

The State's Office of Planning and Research periodically updates its General Plan Guidelines document to provide guidance to jurisdictions when updating plans. In recent years, the state has been focusing on improving air quality, affordable housing, and mobility and has adopted legislation to address these topics. In 2017, a comprehensive update to the Guidelines specifically integrated four key themes throughout the document - climate change, economics, healthy communities and equitable opportunities, but particularly climate change. As stated in the Guidelines, local policies can help achieve statewide goals, such as accommodating growth while supporting equitable development and a strong economy in the context of climate change.[12] General plans address land use and zoning, as stated in the Guidelines, but can also promote better projects, integrated planning, and improved access and use of available resources.

As discussed in Chapter 3.0, Project Description, planning issues and new mandates have emerged and evolved in the past 30 years, including sustainability (2006 California Global Warming Solutions Act and the 2008 Sustainable Communities Act), mobility (the 2008 Complete Streets Act), health and wellness, historic preservation, and affordable housing. The partially RDEIR in 2019 also explained changes to transportation metrics per SB 743, to assess transportation impacts based on vehicle miles traveled instead of vehicle delay at intersections. In addition to the primary objectives described previously, the Proposed Plan has secondary objectives, such as to encourage and promote a variety of mobility options, improve the function and design of neighborhoods, improve open space, parks, and public spaces, encourage sustainable land use, and maintain land use and zoning consistency. The Proposed Plan addresses these local and statewide issues with revised or updated goals, policies, zoning, and implementation programs that reflect input and recommendations from community stakeholders to the extent those are consistent and do not conflict with the objectives and mandates of the City and the State. For reference, the comprehensive goals, policies, and implementation programs of the Hollywood Community Plan Update are organized in the Community Plan in chapters titled Land Use & Urban Form, Public Realm, Parks, and Open Space, Preservation, and Mobility and Connectivity; see the Updated **Appendix D**, Draft Community Plan of the EIR. Within these chapters, the topics of housing and affordable housing, transit and mobility, economic development, sustainability, historic preservation, parks and open space, and design are addressed.

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[11] Phillips, S. (2020). Does the Los Angeles region have too many vacant homes? UCLA: The Ralph and Goldy Lewis Center for Regional Policy Studies. Retrieved from https://escholarship.org/uc/item/87r4543q

[12] State of California, *2017 General Plan Guidelines*, http://www.opr.ca.gov/planning/general-plan/, accessed May 17, 2019.

Development and growth can continue to occur under the 1988 Hollywood Community Plan, which was adopted approximately 33 years ago. For context, that Plan was adopted about a decade before the Metro B (Red) Line stations began operating in Hollywood in 1999. But, as stated in Chapter 5.0, Alternatives, of the EIR, the existing 1988 Plan would not achieve most of the Proposed Plan's primary and secondary objectives. It would not direct growth and maximize development opportunities around existing transit systems, transit hubs, and corridors. Known inconsistencies between land uses, zoning, and General Plan land use designations would not be corrected or updated. In addition, future development would not be subject to the Proposed Plan's design, neighborhood compatibility, and hillside protections. The CPIO District, which has regulatory protections for historical resources, pedestrian-oriented design regulations, and an affordable housing incentive system, would not be established. Transportation and mobility network improvements under the Proposed Plan would also not be implemented. Achieving the objectives desired for the CPA involves the implementation of the Proposed Plan's land use and zone changes. The Hollywood Community Plan Update reflects the City's vision, inclusive of community goals for the next two decades while also fulfilling the State's mandate to plan for climate change and more sustainable land use patterns.

Planning for Hollywood's Post Pandemic Future

The COVID-19 pandemic that began in March 2020 has had a major impact on the health, safety, and jobs for a significant number of Los Angeles residents. The preexisting socio-economic, racial, and environmental disparities have led to higher incidences of COVID-19 in Black and Latinx communities in Los Angeles and in the nation. Several issues have contributed to the disparities in COVID-19 impacts, including a higher percentage of essential and frontline jobs, as well as less access to health care and higher rates of underlying health conditions, which are often the result of historic planning practices. Other factors include living far away from jobs, or in overcrowded and multi-generation households due to housing affordability. The short-term effects of COVID-19 on unemployment, mobility changes, and morbidity have been dramatic but with the greater availability of vaccines and the state reopening on June 15, 2021 some of these changes are showing signs of normalizing again. The long-term effects remain to be seen, but the high cost of housing, for both purchase and rent, has been a challenge and is one that will need concerted efforts to improve. Accommodating growth and encouraging housing development reflects some of the primary goals of the Hollywood Community Plan Update, which plans for a horizon year of 2040. The housing crisis pre-dated the pandemic, however the need for housing, and particularly affordable housing, has become even more apparent. The need is both a short and long-term challenge that can be addressed through land use planning, and specifically through planning for additional multi-family housing.

MASTER RESPONSE NO. 3 - HISTORIC RESOURCES

Summary of Master Response

- **The Proposed Plan includes a number of provisions to strengthen regulations for the protection of historical resources, including new regulations for historic preservation within the Hollywood Community Plan Implementation Overlay (CPIO) District.**
- **Future development that has the potential to impact a specific designated historical resource or resources will be required to conduct CEQA analysis to assess the impact to such individual historical resource(s) and to identify feasible mitigation measures and alternatives.**
- **The conclusion that there will be significant and unavoidable impact to historical resources is based on the potential for redevelopment in the Plan Area to impact historical buildings and is not because loss or damage is anticipated to any specific resource.**
- **Commenters provide no substantial evidence supporting the need for a revised analysis of historic resources or revised conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).**

Summary of Comments

A number of comments were received related to historical resources, generally expressing concern that the Proposed Plan does not address historical resources identified in the EIR in the proposed zoning regulations. Commenters were particularly concerned that impacts to historical resources were determined to be significant and unavoidable and that no mitigation measures were identified. The commenters express that the Proposed Plan would favor development over preservation of historic buildings. Commenters also referred to the policies contained in the Preservation Chapter (Chapter 5) of the Draft Hollywood Community Plan, as well as other City policies contained in the General Plan that call for historical resource preservation and conclude that the Proposed Plan is inconsistent with these policies due to the proposed zone changes and lack of mitigation measures to address potential impacts to historical resources. Commenters also asked why mitigation measures from the Hollywood Redevelopment Plan could not continue to be used to mitigate the potential impact to historical resources.

Overall, the concern for how historical resources are addressed in the Proposed Plan and EIR stems from a general opinion that the Proposed Plan would result in permanent changes to the character of the Hollywood Community Plan Area through the loss of historical resources. Commenters who expressed this concern stated that additional policies and mitigation measures should be added to protect the historical resources identified in the EIR. Strategies identified by commenters to address these concerns include downzoning in areas with known concentrations of historical resources. Comments were also received asking for more policy and regulatory mechanisms for historic preservation including adaptive re-use, transfer of development rights, encouraging compatible additions (rather than demolition), and parking relief.

Response

The Proposed Plan incorporates policies, implementation programs, and zoning that will assist in further protecting both designated and eligible historical resources. The Proposed Plan includes a Hollywood Community Plan Implementation Overlay (CPIO) District, a zoning tool that includes a new historic preservation review process, in addition to the City's existing regulatory procedures for the protection of designated and eligible historical resources (described in the EIR at 4.5-7 to 4.5-9 describing the HPOZ Ordinance, Historic-Cultural Monument (HCM) regulations, and Los Angeles Municipal Code (LAMC) Section 91.106.4.5). A summary of the CPIO District is provided below.

Non-designated, Eligible Historical Resources

The EIR does not limit or change the requirements or authority provided in CEQA for environmental review of future projects with regard to eligible historical resources in the CPA. As indicated on pages 4.5-1 to 4.5-9 in Section 4.5, Cultural Resources, eligible historical resources include a building, structure, object, site, landscape, natural feature, or historic district identified as eligible for listing either individually or as a contributor to a district under a local, state, or federal designation program through SurveyLA (the Los Angeles Historic Resources Survey), or another historic resource survey completed by a person meeting the Secretary of the Interior's Professional Qualification Standards for Historic Preservation and accepted as complete by the Director, in consultation with the Office of Historic Resources (OHR), such as the Historic Resources Survey completed by CRA/LA-DLA on January 28, 2020 pertaining to the Hollywood Redevelopment Project Area. The DCP will continue to require and conduct project-specific CEQA review to evaluate potential impacts to such historical resources as discretionary planning approvals are expected within the CPA and throughout the City of Los Angeles. If project-specific impacts are determined to be significant, feasible mitigation measures and alternatives will be required to be identified and implemented as appropriate to that specific project, in order to reduce the significant impact. Such projects are not evaluated by, nor environmentally cleared by the Proposed Plan's EIR.

Resources identified as appearing eligible for listing on the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), or local listing or designation have the potential to be historically significant. Although these buildings may be potentially significant, for

by-right and ministerial projects, the City currently only reviews permits for buildings that have been designated as an HCM or otherwise officially designated, or have been determined through state or federal action to be eligible for Designation on the National Register, as discussed on page 4.5-8. In most instances, a State or Federal action to determine the eligibility of a resource results in a state designation. Eligible resources that are not subject to Section 91.106.4.5 of the LAMC are not currently protected by City ordinance.

In February 2020, Section 91.106.4.5.1 of the LAMC was amended by the City Council (CF 16-0988-S1). The amended requirement states that permits for the demolition of a building over 45 years old will not be issued unless abutting property owners and occupants, the applicable City Council Office, and the Certified Neighborhood Council Office representing the site, are provided with written notice of the demolition pre-inspection application via U.S. mail, and a public notice of application for demolition has been posted on a placard at the site at least 60 days prior to the date of issuance. The former notification and posting time period was a minimum of 30 days. This pre-demolition notification allows interested community members and stakeholders, the public or the City time to determine whether to nominate the potential resource as a Historic Cultural Monument (HCM), and if nominated, to fully evaluate its potential as a resource. A demolition permit may not be issued for a building where the process to designate has been initiated. Concurrently in February 2020, the City Council also expanded the definition of initiation of the designation of a HCM to include the introduction of a Motion by a Member of the Council.

Designated Historical Resources

The EIR does not limit or change the requirements or authority provided in CEQA for environmental review of future projects with regard to designated historical resources in the CPA, and that if an individual discretionary project in the future has the potential to impact a historical resource that cannot be mitigated, an EIR will be required and also adoption of statement of overriding considerations. Designated historical resources include buildings or structures that have been officially designated on the National Register, on the California Register, as Historic Preservation Overlay Zones (HPOZs), or that have been included on the City's list of HCMs. The DCP will continue to require and conduct project-specific CEQA review to evaluate potential impacts to such historical resources as discretionary planning approvals are expected within the CPA and throughout the City. As discussed on page 4.5-7 of the EIR, any project proposals affecting HCMs are reviewed pursuant to Los Angeles Administrative Code (LAAC) Section 22.171.14. Per the provisions in the Cultural Heritage Ordinance (CHO) and the HPOZ Ordinance, the OHR reviews all projects that are designated historical resources. Any project that involves a substantial alteration to a designated historical resource must comply with CEQA. If a project identified by the Cultural Heritage Commission (CHC) or the OHR could impact a designated historical resource, then such a project must be evaluated to determine the applicable environmental review process.

As discussed on page 4.5-8 of the EIR, if it is determined that loss or damage to a historical resource could occur, the project applicant is required to conduct a CEQA analysis to determine if the impact is significant, and the Department of Building and Safety may not issue a permit without first preparing a CEQA clearance, analyzing impact to the historical resources, and if there will be a significant and unavoidable impact on a finding that specific economic, social or other considerations make infeasible the preservation of the building or structure (LAMC Section 91.106.4.5). Additionally, if impacts are determined to be significant, feasible mitigation measures and alternatives are to be identified and implemented as appropriate to reduce the significant impact. If there is no feasible mitigation measure or alternative to avoid the significant impact, the City will be required to adopt a statement of overriding consideration under CEQA Guidelines Section 15093. Impacts to individual historical resources are not evaluated by, nor environmentally cleared by the Proposed Plan's EIR.

Section 4.5 of the EIR describes the procedures and controls of the CHO and HPOZ Ordinances on pages 4.5-7 through 4.5-8. As discussed in Section 4.5, it is not expected that designated historical resources would

be impacted by the Proposed Plan based on the regulatory control ordinances that designated resources are subject to in the City's HPOZ Ordinance and/or the CHO regulations.

In addition to the CEQA review process, the OHR and the CHC reviews requests for demolition, substantial alteration or relocation of any HCM, for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. In instances where demolition is proposed, an additional report regarding the structural soundness of the building or structure and its suitability for continued use, renovation, restoration or rehabilitation from a licensed engineer or architect who meets the Secretary of the Interior's Profession Qualification Standards as established by the Code of Federal Regulations (CFR), 36 CFR Part 61 is required. It is extremely rare to lose an HCM, but since the first monument was designated in 1962, at least 40 of the City's approximately 1,200 monuments located in the City have been lost to fire, storms, relocation, alteration, and demolition.

Projects located within HPOZs require review and approval by the OHR or an appointed HPOZ Board. Alterations to the exterior of a structure or site are considered a project and are reviewed through either a ministerial or a discretionary process. All projects are reviewed by the OHR for conformance with the HPOZ Ordinance LAMC Section 12.20.3; the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; and when one exists, a Preservation Plan. In addition to the CEQA review process, the HPOZ Ordinance establishes a process for the demolition, relocation, or removal of a Contributing Resource to the HPOZ as outlined in LAMC Section 12.20.3.K5. The ordinance requires that the project demonstrate to the Area Planning Commission that the owner would be deprived of all economically viable use of the property, as demonstrated though structural surveys, cost estimates, market valuation, and professional expertise. Only five applications for a Certificates of Appropriateness for Demolition, Removal or Relocation have been received in the 30 plus years of the Ordinance implementation. Of these five projects, four involved the demolition or relocation of an accessory structure (garage). As such, it is extremely unlikely that a Contributor to an HPOZ will be lost.

The Proposed Plan does not introduce any features that would preclude implementation of these policies or procedures, nor does the Plan alter these policies or procedures in the HPOZ Ordinance or CHO in any way. All development involving designated historical resources are required to comply with mandatory review procedures. As discussed in Section 4.5, the OHR reports that it is extremely uncommon in the City to lose designated resources when a property owner has complied with the City's regulations.

Hollywood Community Planning Implementation Overlay (CPIO)

The Proposed Plan includes a zoning tool that aims to further protect both eligible and designated historical resources. The proposed Hollywood CPIO District implements the goals and policies of the Hollywood Community Plan Update including by promoting the preservation and rehabilitation of identified historic resources. The CPIO's boundaries are within central Hollywood and generally follows Franklin Avenue to the north, the 101 Freeway to the east, Melrose Avenue to the south, and La Cienega Avenue to the west but it does not encompass the entire area within these boundaries. See the CPIO boundaries in updated **Appendix E**, Proposed CPIO. The CPIO has four types of subareas: Regional Center, Corridors, Multi-family Residential, and Character Residential.

The CPIO applies historic review regulatory protections for both residential and commercially zoned properties and has CEQA review processes intended to protect historical resources. The CPIO includes provisions to protect eligible and designated historical resources from inappropriate alterations and demolitions.

First, the CPIO requires that resources identified as potentially eligible for either the state or National Register or Historic Resources, or as a contributor to a historic district under a local, state, or federal

designation program, through SurveyLA or the Redevelopment Agency Surveys, or any subsequent historic resource survey completed by a person meeting the Secretary of the Interior's Professional Qualification Standards for Historic Preservation and accepted as complete by the Director, in consultation with the Office of Historic Resources, to be subject to CEQA even if the project otherwise only requires ministerial review.

Additionally, the CPIO also includes development standards that regulate the massing, site design, and composition of new construction within the CPIO. Within the Regional Center and Character Residential CPIO subareas, development standards have been crafted to ensure new construction is compatible with existing historical resources. For instance, within the Regional Center CPIO Subarea, new projects within the Hollywood Boulevard National Register District must have a ground floor with storefront bays, to maintain the established pattern of development. Within the Character Residential CPIO Subarea, development standards will apply to both designated and eligible historic districts, providing a review process for areas which are currently not protected. This includes reviewing additions and new construction on parcels that are not historic (non-contributing) within the district boundaries. See the Proposed CPIO (Updated **Appendix E**) for more details.

The CPIO Incentive System will replace the Citywide TOC Guidelines with incentives tailored to each subarea. For instance, CPIO Subarea RC3 in the Regional Center, which contains buildings within the Hollywood Boulevard National Register District, would allow density bonuses for providing affordable housing on site but not height increases (bonuses). To encourage the adaptive reuse and continued use of historic structures, the incentive system substantially reduces or eliminates minimum parking requirements for historic areas including the Regional Center and Character Residential subareas.

In addition, the CPIO is proposing a Transfer of Development Rights (TDR) program to facilitate the preservation of historical resources while enabling development rights to be utilized on more appropriate sites, all within the Regional Center land use area in central Hollywood. Under the proposed TDR program it is envisioned that a process to facilitate the transfer of unused floor area from a donor site could create an economic incentive to rehabilitate historic resources within the Regional Center. Use of the proposed TDR program is proposed to involve consulting with the Department of City Planning, Office of Historic Resources to identify the significant historic features that are required to be maintained, to identify any rehabilitation work required to be completed and to execute a Preservation Plan and Easement. For more information, see the Proposed CPIO (Updated **Appendix E**) for more details.

Accordingly, projects within the CPIO would be subject to environmental review and associated protections for historical resources. Thus, adoption of the Proposed Plan would provide additional protection for some eligible resources that are currently not protected and would not be protected in the future without implementation of the Proposed Plan.

Hollywood Community Plan Update Policies and Implementation Programs

The Proposed Plan contains numerous goals and policies for the protection of historical resources (see Table 4.5-3). These policies and programs support the objective of the Conservation Element of the General Plan to "protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes." Several commenters requested including the Proposed Plan's implementation programs as mitigation measures in the EIR; however, the implementation programs are part of the Proposed Plan and were factored into the analysis of impacts to historic resources. The EIR finds that there would be significant and unavoidable impacts to historic resources despite the implementation programs listed below in Table 4.5-3 (EIR pages 4.5-45 to 4.5-46):

TABLE 4.5-3: PROPOSED PLAN POLICIES AND PROGRAMS RELATED TO CULTURAL RESOURCES	
Policies/Programs	**Description**
Policy LU7.7	Preserve and promote Theatre Row. Maintain existing land use controls to protect the cluster of small equity-waiver theaters on Santa Monica Boulevard between El Centro and McCadden. (P10)
Policy P1.1	Significant neighborhoods and districts. Support the preservation of culturally and historically significant neighborhoods and districts. (P28, P29, P30, P31, P68)
Program P28	Ensure that the character of historic neighborhoods are maintained by existing and new HPOZs in Hollywood by providing guidance for the rehabilitation of historic structures and the review of new development within historic neighborhoods.
Program P29	Develop a historic preservation district or districts in Los Feliz with community involvement and support.
Program P30	Study and support efforts to initiate a California Main Street district through the state for the Hollywood Boulevard National Historic District area.
Program P31	Study the historical resources in neighborhoods surrounding the Melrose Hill HPOZ.
Policy P1.2	Adaptive reuse. Promote the preservation and adaptive reuse of existing building stock, especially for designated or eligible historical resources. (P65)
Program P65	Improve and streamline the building permit process and ensure compatible rehabilitation of historical resources by providing early technical advice and assistance from the staff of City Planning and Building and Safety.
Policy P1.3	Designated and potentially significant resources. Preserve designated Historic Cultural Resources and further study eligible resources as potentially significant resources. (P38)
Program 38	Study the implementation of a Specific Plan, Community Plan Implementation Overlay (CPIO), or other zoning tools in central Hollywood, including Sunset Boulevard and Hollywood Boulevard, which may include guidelines for site planning and building design, controls on lot consolidation, and possible requirements for approved plans prior to demolition, in order to ensure that infill development in the Regional Center complements existing neighborhood character.
Policy P1.4	Historical buildings. Protect designated and eligible historical buildings in the Regional Center. (P33, P38)
Program P33	Study the feasibility of implementing a Transfer of Development Rights program in Hollywood to encourage preservation of historical resources.
Policy P1.5	Distinctive street features. Protect and enhance distinctive features of prominent streets in Hollywood, such as the Walk of Fame, a recognized Historic Cultural Monument of the City of Los Angeles. (P66, P138)
Program P66	Work with the Bureau of Engineering, the Hollywood Historic Trust, and the Chamber of Commerce to establish a Treatment Plan to guide future rehabilitation work affecting the Hollywood Walk of Fame.
Program 138	Support plans and initiatives, such as the HEART of Hollywood, a long-term strategic and creative initiative to promote economic growth and design, to improve features of prominent streets.
Policy P1.6	Study preservation tools. Support the study of R1 Variation Zones, Community Design Overlays (CDOs), or a Community Plan Implementation Overlay (CPIO) for neighborhoods that retain a cohesive character but are not eligible to become Historic Preservation Overlay Zones.
Policy P1.7	Preserve designated resources. Any development project which involves designated historical resources, including City of Los Angeles Historic-Cultural Monuments, shall conform with the Secretary of the Interior's Standards for Rehabilitation. (P35)
Program P35	Establish zoning regulations to ensure appropriate review of design for resources.
Policy P1.8	Complementary design. Encourage the design of new buildings that respect and complement the character of adjacent historical resources through design standards outlined in implementation tools such as Community Design Overlays (CDOs), or a Community Plan Implementation Overlay (CPIO). (P36, P37, P38)
Program P36	Utilize adopted Citywide Design Guidelines for new and infill development.

TABLE 4.5-3: PROPOSED PLAN POLICIES AND PROGRAMS RELATED TO CULTURAL RESOURCES	
Policies/Programs	**Description**
Program P37	Study the garden apartments in the block bounded by Prospect Avenue on the north, Rodney Drive on the west, Lyman Place on the east, and the alley north of Hollywood Boulevard on the south for potential historic significance.
Program P38	Study the implementation of a Specific Plan, Community Plan Implementation Overlay (CPIO), or other zoning tools in central Hollywood, including Sunset Boulevard and Hollywood Boulevard, which may include guidelines for site planning and building design, controls on lot consolidation, and possible requirements for approved plans prior to demolition, in order to ensure that infill development in the Regional Center complements existing neighborhood character.
Policy P1.9	Land use and zoning. Maintain appropriate General Plan Land Use designations and zoning in existing historic districts which are either listed in, or are eligible to be listed in the National Register of Historical Resources. Promote infill development that matches the scale of historical resources within each district, including the following: height, massing, setbacks, stepbacks, and development pattern. (P39)
Program P39	Study design regulations for: • Afton Square Historic District: Eastern half of block between Leland Way on the north, El Centro to the east, De Longpre to the south and Vine to the West. • Selma-Labaig Historic District: Both sides of Labaig roughly between Gower and Gordon, including the north side of Harold Way. • Serrano Historic District: East side of Serrano roughly between Hollywood Boulevard and Sunset/west side of Serrano generally between Carlton Way and Sunset.
Policy P1.10	Height limits. Maintain height limitations on commercial zones that border designated or eligible historic neighborhoods. Encourage the design of new buildings that respect and complement the character of adjacent historic neighborhoods. (P40)
Program P40	Study the creation of new height limits on portions of Sunset Boulevard and Western Avenue that abut designated or eligible historic neighborhoods.
Policy P1.11	Financial resources. Support efforts to identify financial resources for rehabilitation of historical resources. Promote the use of the City's Mills Act Historical Property Contract Program, the Federal Historic Rehabilitation Tax Credit, and the California Historical Building Code. (P67)
Program P67	Partner with the Los Angeles Housing and Community Investment Department, and other agencies to identify new financial resources for rehabilitation grants and loans to low- and moderate-income owners of historic homes.
Policy P1.12	Documentation. Support ongoing opportunities to document Hollywood's history and architectural legacy and share that history with the community. (P41, P68)
Program P41	Support and complete Historic Places LA within the Hollywood Community Plan area, and incorporate SurveyLA findings, and ongoing efforts to create a comprehensive online archive.
Program P68	Seek opportunities to partner with Council Offices, preservation organizations, business improvement districts, certified neighborhood councils, and other community stakeholder groups to create new interpretive programs, tours, and signage highlighting the community's history and architectural legacy.
Policy P1.13	Preserve murals. Support efforts to preserve and restore the rich inventory of murals found in Hollywood.
Program P32	Collaborate with the Department of Cultural Affairs to encourage the preservation of murals in Hollywood.
SOURCE: City of Los Angeles, *Draft Hollywood Community Plan*, 2021.	

EIR Conclusions Regarding Historical Resources

Despite the various existing protections for historical resources in effect in the City, and those proposed as part of the Community Plan update, the EIR concluded impacts to historical resources would be significant and unavoidable because over the 20-year horizon of the Proposed Plan, it is possible that one or more designated resources may be lost by redevelopment occurring consistent with the Proposed Plan. The CHO,

the HPOZ Ordinance, and the CPIO do not prohibit a property from being demolished, redeveloped, or altered so long as an applicant has gone through all necessary processes, including individual project environmental review. It would not be appropriate for the City to provide a blanket prohibition on demolition or substantive alteration of historical resources as such a prohibition would represent a taking of the property and unreasonable restriction on its use.

The conclusion in the EIR is that future development results in significant and unavoidable impacts to historical resources under the Proposed Plan. This disclosure, however, would not allow a developer to avoid environmental analysis of impacts to historical resources from subsequent development. Even under the streamlining tool for analysis of impacts of a project consistent with a community plan that was adopted with an EIR, CEQA requires analysis to determine if there are impacts particular to the project or the project site. (e.g., CEQA Guidelines Section 15183(b)(1).) Demolition of a historical resource in a proposed subsequent project would be an impact particular to a project site and specific project. Again, the EIR concluded that any potential impacts that could occur to designated resources in the Plan Area or designated and eligible resources in the CPIO would only take place after an applicant goes through an environmental review process for their specific project (see page 4.5-46).

With respect to identification of additional mitigation measures appropriate to include in this EIR, page 4.5-48 of the EIR indicates that, "[a]s a policy matter, the City finds that requiring additional review of projects not in the CPIO or otherwise undergoing discretionary review is undesirable based on the requirements it would place on City resources and the delay it would result in for projects." The EIR also stated that as a policy matter, the City finds that it is undesirable to put additional regulations or processes to projects involving historical resources that are designated under the HCM or HPOZ, or subject to review by the proposed CPIO, or other discretionary review. For these reasons, no feasible mitigation measures beyond the proposed policies and regulations in the Proposed Plan, including the CPIO, and existing regulatory requirements (i.e., CEQA, HPOZ Ordinance, Cultural Heritage Ordinance, etc.) are identified in the EIR.

Several commenters recommend that the Proposed Plan integrate or continue the mitigation measures stated in the Hollywood Redevelopment Plan EIR. It should also be noted that the mitigation measures of the Redevelopment Plan have not been able to prevent the damage or loss of historical resources, which could occur with redevelopment. For example, the January 28, 2020 Historic Resources Survey completed by CRA/LA-DLA found that 32 properties that were previously found to be eligible historic resources are no longer eligible (as a result of demolition, alterations, or catastrophe), despite the various mitigation measures set forth by the Hollywood Redevelopment Plan EIR. As noted in Appendix M of the EIR, the mitigation measures from the Hollywood Redevelopment Plan EIR were found to be infeasible or not necessary and would not result in a different impact conclusion than that in the EIR. As none of the commenters identified feasible mitigation measures, no mitigation measures are included. As previously stated, it is possible that one or more designated resources could be lost by redevelopment occurring consistent with the Proposed Plan over a plan horizon of about 20 years. For informational purposes, it should be noted the impact to historical resources would not be any different from what would occur under the Existing Plan or likely, any adopted general plan and zoning update. Therefore, as concluded in the EIR, the impact to historical resources is significant and avoidable and there are no feasible mitigation measures to prevent the loss or significant alteration of any designated resource to reduce the impact to be less than significant.

Conclusion

The conclusion that the Proposed Plan would result in a significant and unavoidable impact to historical resources is based on reasonably foreseeable development consistent with the Proposed Plan. As indicated on EIR page 4.5-48:

> While the Office of Historic Resources reports that it is extremely uncommon in the City to lose designated historical resources when a property owner has complied with the City's regulations, the Cultural Heritage Ordinance and the HPOZ Ordinance cannot prevent a

> property from being demolished or redeveloped or prevent structures from being altered. Rather these ordinances provide for processes, including environmental review, but they do not prohibit demolition. Therefore, even though the Proposed Plan incorporates changes that would assist in further protecting both designated and eligible historical resources, it is possible that demolition and/or significant alteration to some of the hundreds of historical resources within the Project Area would occur during the life of the Proposed Plan.

As noted on page 4.5-46, particularly in the Change Areas, the Proposed Plan could result in pressure to remove historical resources. The Proposed Plan compared to the Existing Plan, however, provides additional protections for historical resources, particularly eligible historic resources. In addition, even without the Proposed Plan there exists pressure to redevelop parcels, especially adjacent to transit systems, such as the Metro B (Red) Line stations in the Regional Center and other existing commercial corridor areas. As discussed on EIR page 4.5-46, the Proposed Plan does not introduce any features that would preclude implementation of or alter existing regulations that designated resources are subject to including the HPOZ Ordinance and the CHO regulations. As discussed above and on page 4.5-46 through 4.5-48 of the EIR, all proposed changes to HCM or HPOZ designated historical resources are required to comply with mandatory review procedures. Furthermore, some eligible, non-designated resources not currently afforded any protections that are located within the proposed CPIO District would be protected under the regulations in the proposed CPIO.

Existing regulatory measures (CHO, HPOZ, LAMC Article 1 Chapter IX Section 91.106.4.5) will continue to protect historical resources. The Proposed Plan results in a significant and unavoidable impact to historical resources, but through the CPIO, there are regulatory measures that would reduce the likelihood of adverse impacts to both designated and some eligible historical resources. The CPIO is not identified as a feasible mitigation measure because although it has control mechanisms it cannot prevent the loss or substantial alteration of a designated resource. Commenters expressed concerns that the most historic parts of Hollywood, the Hollywood Boulevard National Register District and adjacent streets, would be adversely impacted by the Proposed Plan. The CPIO provisions provide greater protections for these areas than exist today, by offering a Transfer of Development Rights program; tailoring incentive systems to reduce height impacts; guiding compatible in-fill development through development standards; and protecting eligible and designated historic resources by establishing review processes for alterations including demolition. Furthermore, because the CPIO requires CEQA review for the demolition of certain eligible resources, if impacts are determined to be significant, feasible mitigation measures and alternatives must be identified and implemented to reduce the significant impact or an EIR needs to be prepared and a statement of overriding considerations adopted pursuant to CEQA Guidelines Section 15093. In summary, the Proposed Plan strives to protect historical resources through policies, regulatory zoning, and review processes, but these protections cannot ensure that historical resources will not be lost or altered during the horizon of the Plan.

MASTER RESPONSE NO. 4 – INFRASTRUCTURE

Summary of Master Response

- **The EIR adequately analyzes Utilities and Service Systems (Section 4.16) and concludes that impacts would be less than significant.**
- **Planning for public services and infrastructure in the CPA is not performed separately from the City as a whole. As population and demand for infrastructure capacity increases, the plans of each respective utility and service provider are updated and augmented as needed to keep pace with demand. The City funds needed infrastructure and service improvements through a variety of mechanisms, including General Fund money, user fees, bonds and other measures.**
- **Applicants for individual projects within the City (including the CPA) are required to pay for on- and/or off-site improvements that are necessary to ensure that water supply and conveyance demand/pressure requirements can be met, and that wastewater capacity is available, including construction of a connection to the nearest wastewater line with available capacity.**

- **The construction of new wastewater conveyance systems, water lines, and other utilities within the CPA may be required but would be within the construction impacts analyzed in the EIR.**
- **While comments document existing or historical infrastructure issues, the comments do not identify any specific issues with the EIR analysis or conclusions and provide no substantial evidence supporting the need for additional analysis or different conclusions from those in the EIR (CEQA Guidelines Section 15204(c)).**

Summary of Comments

Several comments express concerns about whether the existing utility and service systems would be able to support the development allowed under the Proposed Plan. Commenters are particularly concerned about the wastewater and water conveyance systems and infrastructure within the CPA's hillside areas. Commenters point to the age of the sewer and water pipes within the CPA, asserting that these conveyance systems have not been upgraded beyond repairing sections of burst pipes. Some commenters expressed the opinion that the Proposed Plan should address the CPA's current deteriorating infrastructure needs. Other commenters pointed to the 2017 EIR prepared for the Crossroads of the World Project on Sunset Boulevard and mistakenly stated that this single project resulted in a significant impact related to wastewater requiring the construction of a new wastewater treatment facility and questioned how the EIR for the Proposed Plan can conclude that impacts related to wastewater would be less than significant, and not require any mitigation measures.

Some commenters state that the analysis of utility and service systems impacts is too general, and the conclusions in the EIR are not supported by substantial evidence. A commenter noted that the EIR acknowledges the potential for infrastructure impacts but fails to identify the areas of concern and then dismisses the potential for utility and service systems impacts based on the City's permitting process. Other commenters state that the City's permitting process can address the infrastructure needs of an individual project; however, in their opinion, the permitting process does not address the capacity of the system as a whole or the potential of overall development under the Proposed Plan to accelerate infrastructure failures in parts of the system. This commenter also expresses the opinion that the timing of such project-specific reviews is too late in the development process to avoid potential impacts.

Several commenters take issue with the EIR's premise that impacts related to utility and service systems are speculative. Commenters suggest that if more detailed information was included in the EIR, appropriate mitigation measures could be identified. One mitigation measure suggested by commenters is the creation of a development impact fee to be used to repair existing infrastructure. Commenters also questioned whether a nexus fee study should be conducted in order to develop an infrastructure impact fee for new development occurring in the CPA. Another commenter suggested the EIR include a mitigation measure to limit the size and weight of construction vehicles on substandard streets in hillside areas, as heavy vehicles increase the likelihood of infrastructure failure. Another commenter cited a letter from the City's Wastewater Engineering Services Division that is included in the Appendix of the EIR which states that if the public sewer has insufficient capacity for any proposed building project then the developer will be required to build public sewers to a point in the sewer system with sufficient capacity. This commenter suggested that this requirement be included as a mitigation measure.

Other commenters expressed their opinions that the EIR's premise that the Proposed Plan does not have to include infrastructure or public service improvements because they will be built as needed conflicts with Objective 3.7 of the General Plan Framework which states, "allow for growth in areas where there is sufficient public infrastructure and services, and the residents' quality of life can be maintained or improved." Commenters also assert that the EIR's statement that future Mitigated Negative Declarations (MNDs) and Categorical Exemptions (CEs) would be prepared for individual infrastructure replacement projects, rather than addressing the demand created by the Proposed Plan and cumulative impacts, constitutes a case of improper piecemealing.

In regard to cumulative impacts, commenters also state that the analysis of utility and service systems impacts is deficient because it does not take account of the impact of additional population and housing growth resulting from recent legislation such as Accessory Dwelling Unit (ADU) regulations, Measure JJJ, SB 1818 Density Bonus, and the City's Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines). One commenter pointed to the Los Angeles Department of Water and Power (LADWP) 2015 Urban Water Management Plan (UWMP) stating that it does not account for the increased residential density that will result from these development incentives. This commenter also states their opinion that the EIR ignores the infrastructure crisis facing LADWP and cites LADWP's 2017-2018 Water-Infrastructure Plan, as well as Navigant Consulting, Inc.'s study for LADWP titled "Review of LADWP's 2015 Power and Water Rate Increase Proposal" and "2015 Industrial, Economic and Administrative Survey" (IEA Survey) of the LADWP.

Response

Programmatic Plan-Level Analysis

The EIR appropriately analyzes impacts to utilities and service systems at a programmatic plan level; it is infeasible and would be speculative to try to anticipate all the project-specific on- and/or off-site infrastructure improvements that future development under the Proposed Plan may require. Future development under the Proposed Plan would occur incrementally over time. Since the specific uses and infrastructure-demand characteristics associated with future individual development projects that would occur through the year 2040 are not known at this time, it is speculative to determine how individual development projects could affect the capacity and condition of the existing infrastructure at any particular location. Furthermore, given the size and complexity of the infrastructure systems in the City, including changes in demand profiles, planning for utilities and service systems within the Hollywood CPA is not performed separately from the City as a whole. Guided by the principles in the City's General Plan Framework Element, the City takes an integrated approach to addressing the demand on public infrastructure. Each department is continuously upgrading their systems, which monitor changes in the utilization of services and infrastructure, and each department typically looks at least 20 years ahead to plan for improvements within its area of responsibility.

General Plan Framework Policy 3.3.2 is intended to create a mechanism by which DCP can report on the progress of implementing the General Plan and decision-makers can be informed about infrastructure and service needs. The City Council intended to provide City departments with broad discretion and flexibility when deciding how best to implement the policies of the General Plan Framework Element; consequently, implementation of programs is discretionary and contingent on the availability of adequate funding, which changes over time due to economic conditions and the changing governmental and public policy priorities. Information resulting from the assessment of the infrastructure and service system and General Plan Framework population estimates, citywide and by Community Plan, do not place a limit on growth nor do they restrict development, but rather the information is used to evaluate and report on infrastructure and service demand in light of the growth that is occurring, which has been accomplished through the preparation of this EIR for the Proposed Plan.

See also **Master Response No. 2** regarding how the EIR addresses the TOC and ADU programs. Southern California and the City of Los Angeles in particular are experiencing a housing crisis (as documented in SCAG's 6th Cycle RHNA). The Transit Oriented Communities and ADU programs provide augmented mechanisms through which housing could be constructed within the City. TOC and ADU regulations would help address existing housing demand as well as forecast demand from forecast population growth. The 2020 UWMP was adopted May 25, 2021, after adoption and implementation of the TOC and ADU regulations; the 2020 UWMP documents adequate supply through the year 2045 even through multiple dry

years (summarized in Exhibit ES-T pp. ES-22 through ES-24 and discussed in Chapter 11 and shown in Exhibit 11G pages 11-10 through 11-12).[13]

The City's operating departments regularly prepare plans to show how they will provide the infrastructure and services to accommodate the growing population consistent with the growth projections made in the latest SCAG RTP/SCS, as well as changes in demand based on real world conditions and changes in demand profiles that result from regulations and policies such as requirements for increased water conservation (that reduced both water demand and wastewater generation) and new technologies such as greywater recycling (that also reduced water demand and wastewater generation). Additionally, the City departments have a number of means to find funding sources to pay for needed infrastructure and services, including new fees and taxes, as well as grants, and use of general funds. The City departments have a demonstrated a pattern of finding new funding sources to pay for the provision of new infrastructure and services when gaps are identified.

The City's efforts to evaluate changes in employment and population and their relationship to infrastructure and services are comprised of various data sources and the operating and strategic plans of the departments and agencies that provide services and infrastructure to the City. For example, the City has multiple plans to ensure the City has adequate water supply and facilities and wastewater treatment and conveyance facilities. See, e.g., LADWP's UWMP, Wastewater Capital Improvement Program,[14] the City of Los Angeles Integrated Resource Management Plan (IRP),[15] the One Water LA 2040 Plan[16]). The City and its departments collectively do this on a regular and ongoing basis. Upgraded information systems have expanded the ability of City departments to assess service and infrastructure needs, as well as track the provision of services and infrastructure. Computer technology enables City departments to consider a variety of factors in assessing the need for services, infrastructure, and resources/equipment, such as the Los Angeles Public Library Strategic Plan and the Los Angeles Department of Recreation and Parks's Strategic Plan 2018-2022. Generally, as the demand for public services and infrastructure capacity increases, in accordance with the plans of each respective service provider, utility and public service facilities would be updated and enhanced to keep pace with demand. Not all public service providers are City departments and thus, the City cannot prescribe their actions. However, these agencies provide services, facilities, or funding and administer regulations that directly or indirectly affect the Project Area.

While the Proposed Plan accommodates infill development that would efficiently use existing infrastructure and new development would be required to make the necessary local improvements (such as connections to sewer and water lines and upgraded substations and pumping facilities) per the normal development process, additional infrastructure may be required to support future projects. When it is determined that new or improved infrastructure is needed to meet growing service demand, the City funds these improvements through a variety of mechanisms including property tax revenue; sales tax revenue; user fees; Quimby Act (Park) fees and dedications; business improvement districts; special assessment districts; municipal bonds; the general fund; county, state, and federal funding, and other measures.

To the extent that any significant impacts could result from the unique characteristics of a specific project, those impacts are too speculative to analyze at this time, as stated throughout Section 4.16, Utilities and Service Systems, of the EIR.

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[13] Los Angeles Department of Water and Power, *2020 Urban Water Management Plan*, adopted May 25, 2021.

[14] City of Los Angeles Department of Public Works, Bureau of Engineering, *Wastewater Capital Improvement Program (WCIP), Fiscal Years 2018-19 through 2027-28,* July 2018.
https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035434.pdf, accessed July 2021.

[15] City of Los Angeles Department of Public Works, Bureau of Sanitation, and Department of Water and Power, *Water Integrated Resources Plan 5-Year Review FINAL Documents,* June 2012,
https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/M211.pdf, accessed May 2021.

[16] City of Los Angeles, *One Water LA 2040 Plan, Volume 1, Summary Report,* April 2018,
https://www.lacitysan.org/cs/groups/sg_owla/documents/document/y250/mdi2/~edisp/cnt026188.pdf, accessed May 2021.

Routine infrastructure projects such as replacing or upgrading water and sewer and lines, for example, generally result in less than significant impacts or would be exempt. Most projects to replace a lateral or other sewer line would be exempt pursuant to PRC Section 21080.21, which exempts from CEQA the replacement or construction of a pipeline in a public street of less than one mile in length. Even a project that is not exempt under PRC Section 21080.21 would be foreseeably be eligible for a categorical exemption or a mitigated negative declaration. For example, a project to replace about 3.6 miles of the 36-inch trunk water line was found to have less than significant impacts with a MND in Century Boulevard near LAX.[17]

While the Proposed Plan could require the construction of new or upgraded infrastructure, the infrastructure projects would be expected to be similar to the routine infrastructure projects that typically occur in the City. Similar to the routine infrastructure projects citywide, infrastructure projects in the CPA that are not associated with an individual development project would generally result in either a CE or an MND. In addition, each individual development project will require its own review, approval and environmental clearance. These individual development projects are required to be reviewed by each applicable City department to determine the types of infrastructure improvements, if any, are necessary to meet the demands of that specific project. Since individual development projects are required to comply with each department's requirements and infrastructure improvement projects typically result in the preparation of CEs or MNDs, impacts related to utilities and services systems were determined to be less than significant in the EIR.

Adequacy of Existing Facilities

CEQA documents do not address existing conditions including existing aging infrastructure and associated deterioration, capacity problems or other infrastructure inadequacies unless a project could substantially exacerbate such issues. CEQA addresses impacts of the project as a change from existing conditions. The analysis in Section 4.16, along with discussion below demonstrates that the Proposed Plan will not exacerbate any existing facilities such that it will result in significant impacts. As discussed below and in the EIR, additional development is not anticipated to result in the need for new treatment plants. It may result in the need for updating conveyance systems, pipes and sewers, that are not otherwise being done under the City's existing capital improvement plans. However, as discussed in the EIR and below, this is not anticipated to result in significant unavoidable impacts related to the construction of new infrastructure. To the extent that there are local impacts, those are speculative and any infrastructure project undertaken by the City will be required to be analyzed under CEQA and mitigated if it has impacts. Therefore, the Proposed Plan will result in less than significant impacts even if it causes the need for new conveyance facilities to be constructed. Additionally, it would be speculative to identify that the Proposed Plan will exacerbate existing conditions such that there will be water or sewer line breaks such that it will cause a significant impact. There have been historical sewer line and water line breaks in the City as shown in comments. Water line breaks or sewer breaks can result in the temporary impacts related to circulation impacts or damage to properties in or near the break. It would also result in potential construction impacts to fix the break. But as discussed below, the DWP and BOE have programs to replace the oldest lines, including in the 2020 UWMP to accelerate replacement of 100-year old water lines. It is speculative that the Proposed Plan will result in any water or sewer lines breaking.

Wastewater

The Los Angeles Department of Public Work's Bureau of Sanitation (BOS) has prepared an Integrated Resources Plan (IRP) to manage future wastewater in the City. The IRP includes a Facilities Plan to address the wastewater, recycled water, and storm water related facilities and needs of the City. Objectives of the IRP include, but are not limited to, meeting the projected wastewater system needs of the City; complying with all regulations protecting public health and the environment; conforming to the sustainability guidelines

[17] LADWP, *Century Trunk Line MND*, July 2018, https://www.ladwp.com/.

of the City; providing for safe use of recycled water; and providing cost-effective services. As stated on page 4.16-26 of the EIR, the City's Wastewater Capital Improvement Program (WCIP) also identifies capital projects and estimated costs for the renewal of the City's infrastructure at 10-year intervals. The WCIP was originally adopted in 2006, most recently updated in 2013, and covers Fiscal Year 2013/2014 to 2022/2023.

Project applicants are required to coordinate with the Bureau of Engineering via a sewer capacity availability request to determine adequate sewer capacity. Specifically, LAMC Section 64.15 requires that the Bureau of Engineering perform a Sewer Capacity Availability Review (SCAR) when a sewer permit is sought for a new connection to the City's wastewater system, or in the event that a proposed project is anticipated to generate 10,000 gallons or more of wastewater per day. A SCAR evaluates the existing wastewater collection system to determine whether adequate capacity exists to convey project-related wastewater to the appropriate treatment plant. If capacity is available, the Bureau of Engineering accepts the development project plans and specifications for the individual project's sewer permit application. Otherwise, development projects are placed on a waiting list to receive an allocation of forthcoming capacity, or applicants are required to construct a connection to the nearest wastewater line with available capacity. As stated on page 4.16-20 of the EIR, a development project may not connect to the City's wastewater system until capacity is available and a sewer permit is available. LAMC Section 64.11 and 64.12 also require approval of a sewer connection permit prior to connection to the sewer system. If an individual project within the CPA requires specific on- and/or off-site improvements, such as connections to sewer lines and/or upgraded substations and pumping facilities, the project applicant would be required to fund their fair share of the necessary local infrastructure improvements per the City's preexisting funding mechanisms. Each new connection is also assessed a Sewerage Facilities Charge, which is deposited in the City's Sewer Construction and Maintenance Fund for wastewater-related purposes. Payment of such fees would help to offset the cost associated with infrastructure improvements that would be needed to accommodate wastewater generated by future growth within the Plan Area and the City at large. If system upgrades are required as a result of a given project's additional flow, arrangements would be made with BOS to construct the necessary improvements.

In addition, as water-savings measures are instituted citywide, wastewater flows will decrease and result in decreasing need for new infrastructure (although ongoing maintenance is still required); BOE monitors wastewater flows and water consumption patterns in order to address wastewater infrastructure improvements as appropriate.

With regards to the Crossroads of the World Project, contrary to the comments, the EIR prepared for this project did not conclude that a new wastewater treatment facility would be necessary. The EIR concluded that this project's wastewater flows would not exceed the future scheduled capacity of any wastewater treatment plant. It was determined that the capacity of the existing sewer lines serving the project would be generally be adequate to accommodate the additional wastewater infrastructure demand created by the project. To serve the project's demand for waster wastewater the project required that an off-site 30-inch sewer main be removed and replaced with new sewer mains at Selma Avenue from Las Palmas Avenue to Cassil Place, Cassil Place to Las Palmas, and Sunset Boulevard from Cassil Place to Las Palmas Avenue; however, the EIR stated that this work would be coordinated with BOS so as not to interrupt service to other users. The EIR did not find any significant impacts related to wastewater, and no mitigation measures related to wastewater were identified.[18]

[18] City of Los Angeles, *Crossroads Hollywood Project Final Environmental Impact Report*, Case Number: ENV-2015-2026-EIR (pages IV.M.2-17 to IV.M.2-20 and Appendix Q of the published Draft EIR, May 2017; the Draft EIR became part of the Final EIR on certification by the City Council on January 22, 2019).

Water

The LADWP's 2015 UWMP forecasts future water demand and water supplies under average and dry year conditions through the year 2040. The UWMP identifies future water supply projects, such as recycled water; provides a summary of water conservation Best Management Practices (BMPs); and provides a single and multi-dry year management strategy. As indicated in the 2015 UWMP, the City is planning to provide water for a population of 4,441,545 in 2040. The demographic projections for LADWP service area were provided by the Metropolitan Water District of Southern California, who receives demographic projections from the SCAG RTP/SCS. The reasonably expected population in 2040 in the CPA would be within the citywide SCAG projection utilized in the 2015 UWMP.

In early 2016, LADWP initiated a rate increases of 4.7 percent per year for five years (2016 to 2020) to fund improvements to the water system including investing $3.7 billion to complete projects such as replacing approximately one million feet of distribution mainline, replacing 25 water distribution valves, replacing 125,000 small meters, and refurbishing the Los Angeles Aqueduct system.[19] As stated on page 4.16-14 of the EIR LADWP also prepares a Water Infrastructure Plan to address long-term goals for replacing water infrastructure, including water mainline and trunk lines. Mainline replacements are prioritized based on the leak history, soil conditions, and age of pipe, risk of service interruption and community disruption, and coordination with Bureau of Street Services' paving schedule. LADWP is increasing the rate at which it replaces water distribution mainline to bring the pipe replacement cycle closer to the expected pipe life cycle by year 2020.

The latest published LADWP's Water Infrastructure Plan 2018-19 states that the City's fiscal year 2017-18 leak rate of 19.6 per 100 miles is better than the national industry average of 25 leaks per 100 miles. The same report provided a graph titled Mainline Installation and Number of Leaks, which shows that the number of leaks per 100 miles have decreased significantly since fiscal year 2006/07, and there has been a constant increase in miles for the water mainline replacements every year since 2006 (from 16 miles to approximately 296 miles in fiscal year 2017-2018). LADWP's Water System Ten-Year Capital Improvement Program for the Fiscal Years 2010-2019 shows that about 36 percent of the $6.6 billion budget is dedicated to infrastructure reliability, which includes replacing or upgrading major system components, primarily distribution mains, major system connections, and reservoir improvements. The LADWP Briefing Book 2019-20 states that there is a goal to invest over $6 billion to upgrade and replace critical water infrastructure through the water system capital improvement plan over the next five years.

One of the long-term goals for LADWP is to achieve and sustain a replacement cycle that is consistent with the expected 100-year life of water mains.[20] LADWP has also commenced pilot projects to test and evaluate alternate pipe materials to maximize the life of pipeline infrastructure and reduce long-term maintenance. According to LADWP's 2020 UWMP, LADWP has exponentially ramped up its mainline replacement cycle to reach its goal of a 100-year pipe replacement cycle by 2023. LADWP's 2020 UWMP lays out a detailed plan to develop a sustainable water supply portfolio that meets the current requirements and outlines new long-term strategies for water supply and resources management for the next 25 years, which demonstrates adequate water supply for dry and multiple dry years for the Proposed Plan and forecasted Citywide SCAG growth.

Improvements to existing local water delivery lines are funded through rate increases. LADWP increases water rates to provide continued system reliability and meet regulatory obligations and financial and conservation requirements. The department strategically uses available funding to maintain water system infrastructure reliability. According to LADWP's Water System Rate Action Report, LADWP increased water service base rates in 2009 partly to pay the necessary expenses of operating and maintaining the water

[19] LADWP, *Water System Rate Action Report. Chapter 1: Executive Summary*, July 2015.
[20] *Ibid.*

system. Since this rate increase, major investments have been made to improve the LADWP water system. These improvements included replacing approximately 224,000 feet of water quality-related trunk lines. LADWP also increased rates in 2016 to continue to improve water system infrastructure, continue to meet regulatory requirements and develop sustainable local water supply, while maintaining a healthy financial standing.[21]

As outlined the regulatory framework in Section 4.16 of the EIR, new development in the CPA would be required to comply with the Los Angeles Water Efficiency Requirements (Ordinance No. 180822), Los Angeles Green Building Code (Ordinance No. 181480), and the 2010 California Green Building Standard Code. In addition, as a result of water conservation incentives, existing property owners are conserving water. Increased water conservation associated with new and existing uses is changing water delivery requirements, complicating LADWP's and Bureau of Sanitation's abilities to forecast where water and wastewater infrastructure improvements will be needed.

Applicants for new development projects over a certain size (including within the CPA) must comply with SB 610 (California Water Code Sections 10910 to 10915). As stated on page 4.16-3 of the EIR, SB 610 requires large development projects to prepare a Water Supply Assessment (WSA) in order to determine water supply sufficiency for a 20-year projection, in addition to the demand of existing and other planned future uses. Under State Water Code Section 10911, if the WSA concludes that water supplies are insufficient, the WSA is required to discuss plans for acquiring additional water supplies and set forth the measures that would be undertaken to acquire and develop those water supplies.

As discussed in the EIR, local water delivery lines may need to be augmented in certain locations depending on specific uses, locations, and the capacity and conditions of the existing infrastructure. Applicants of new development projects within the CPA would continue to be required to coordinate with LADWP to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. In coordination with the LADWP, each applicant is required to identify any specific on- and/or off-site improvements needed to ensure that water supply and conveyance demand/pressure requirements can be met prior to issuance of a certificate of occupancy. As a result of LADWP's ongoing programs to address aging pipes and requirements for applicants to coordinate with LADWP it is not anticipated that the Proposed Plan would substantially exacerbate existing problems. Existing regulations and City requirements ensure that sufficient water supplies and water conveyance facilities are in place prior to occupancy of new development.

Plan Consistency

The Proposed Plan does not conflict with the General Plan Framework because it does not rely on providing infrastructure only as needed as argued by a commenter. As discussed above, the City Departments that provide services and utilities develop strategic plans to accommodate forecasted growth and needs. While it is the case that some smaller facilities will be needed based on increased demand from development and more concentrated growth in one part of the City or another, the City Departments include that flexibility in plans and practices. In any case, before undertaking any infrastructure project the Departments prepare CEQA. There is no basis or evidence to support that the City does not have adequate facilities and service to serve the Proposed Plan and including in a way that conflicts with the Framework Element Objective 3.7 or would result in an impact to the environment.

Additionally, there is no piecemealing because the EIR analyzes the potential for the Proposed Plan to result in the construction of new facilities in the Draft EIR to the extent feasible based on existing information and substantial evidence. The City is not required to analyze speculative impacts.

[21] LADWP, *Water System Rate Action Report, Chapter 2,* July 2015.

MASTER RESPONSE NO. 5 – EMERGENCY SERVICES

Summary of Master Response

- **The EIR adequately analyzes potential impacts to: emergency access in the recirculated Section 4.15, Transportation and Traffic; fire protection and emergency service facilities and police protection facilities in Section 4.14, Public Services; and evacuation or response plan interference and exposure to significant loss involving wildland fires in Section 4.8, Hazards and Hazardous Materials. The conclusion is that impacts would be less than significant.**
- **The response below clarifies the EIR analysis and addresses the commenters' concerns; it clarifies and bolsters the analysis in the EIR, and does not constitute significant new information or change the impact conclusions of the EIR.**
- **Both Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD) have current strategic plans for emergency services, protection and safety; LAFD's plan is for 2018-2020 and LAPD's is for 2019-2021. LAFD has initiated a work program to create a long-term deployment plan called Standards of Cover that will inform the appropriate levels of staffing, facilities, equipment, and response times.**
- **Both LAFD and LAPD employ technology and use data to constantly analyze, evaluate, and improve their responses to emergency services as a result of demand and change; LAFD uses FireStatLA and LAPD uses COMPSTAT. Leaders in these departments review and discuss data regularly and adjust resources, including staffing and equipment, to maintain appropriate standards, including response times.**
- **Increased demand for emergency services or response times do not by themselves constitute a physical impact to the environment that must be analyzed under CEQA for significance; impacts to emergency services are assessed based on whether the Proposed Project would require the construction of new or expanded fire protection, emergency services, or police protection facilities and whether the construction of those new or expanded facilities would result in direct or reasonably foreseeable indirect environmental impacts.**
- **LAFD educates, implements, and enforces brush clearance requirements, the strictest in the state, in the City's Very High Fire Hazard Severity Zones, which include the hillside communities of Hollywood. LAFD monitors weather conditions every day and can pre-deploy resources, including staffing and ground and air apparatus, to prepare in the event of a fire.**
- **In addition to fire suppression and prevention, LAFD also responds to a large number of emergency medical calls. More than 85 percent of LAFD's daily responses are medical related, and LAFD has been implementing public health pilot programs to improve medical responses.**
- **The City's Emergency Management Department (EMD) works in conjunction with LAPD and LAFD and has a supporting role. EMD staff are regularly on call and are ready to coordinate and notify the public when there is an emergency or critical situation. EMD has emergency action plans for various situations such as disasters and terrorism.**
- **LAFD and LAPD review and regulate development projects in terms of fire protection, such as fire sprinklers and access to hydrants, and building/site plan designs that deter crime.**
- **The comments on the EIR do not identify any specific issues with the EIR analysis or conclusions and provide substantial evidence supporting the need for additional analysis or different conclusions from those in the EIR (CEQA Guidelines Section 15204(c)).**

Summary of Comments

Comments regarding emergency services were received during the public comment periods of both the EIR published in 2018 and the partial recirculation of the EIR in 2019. The summary of comments below includes comments received from both comment periods. Many comments regarding emergency services from the 2018 EIR were addressed in the recirculated Section 4.15, Transportation and Traffic, which was published on October 31, 2019. The response provided below will address both sets of comments.

For the 2018 EIR, several commenters indicate that the City has no strategy to increase police and fire services in the CPA and express concern that expected increases in density, population, and development allowed under the Proposed Plan would exacerbate the potential risk of issues associated with public safety and response times in the CPA. Commenters stated concerns about gridlock, construction road closures, possible increased crime, as well as tourists and other local visitors impeding the evacuation of hillside areas. Commenters also note that Hollywood could be a high risk for terrorism and are concerned that the EIR does not discuss, analyze, or provide mitigation measures to address these issues. One comment states that the standards used to assess impacts are inadequate, and the lack of adequate data and quantification of traffic impacts and other factors, such as road closures for construction and events, demonstrate that the EIR is inadequate. One comment notes that the significant impacts identified in Section 4.15, Transportation and Traffic, of the 2018 EIR did not address emergency service response times. Another comment states that the first responder data is outdated, is not accurate, is incomplete, and used incorrect metrics.

For the recirculated Section 4.15, Transportation and Traffic, a few comments state that Hollywoodland residents are concerned about the potential of a wildfire happening there and point out issues regarding effective access, both ingress and egress, during an emergency, and potential evacuation delays due to hillside streets being narrow and existing traffic from visitors going to see the Hollywood Sign. A few comments state that the area is in a Very High Fire Hazard Severity Zone (VHFHSZ). One comment states that LAFD cannot provide adequate response times during the Hollywood Bowl and Hollywood Boulevard events, and the agency needs adequate funding to meet safety needs. Another comment states that LAFD should evaluate cumulative impacts to emergency services, including staffing and response times.

Response

The analysis of whether the Proposed Plan would result in inadequate emergency access was addressed in Section 4.15, Transportation and Traffic, of the EIR published in 2018 and in the partially recirculated EIR. Section 4.15 was updated and recirculated in 2019 to reflect the new CEQA Guidelines and the City's adopted transportation thresholds regarding Vehicles Miles Traveled (VMT), the metric used as the focus of transportation planning and traffic impact analysis. The impact of traffic congestion on access for emergency response and safety was discussed in the recirculated Section 4.15, Transportation and Traffic.

For more information, see Chapter 1.0, Introduction, to the RDEIR (2019) along with the recirculated Section 4.15, Transportation and Traffic and **Master Response No. 8 – Transportation and Traffic** addresses comments regarding special events, road closures, and traffic data.

The 2019 recirculated Section 4.15, Transportation and Traffic addresses many of the comments regarding emergency services. For brevity, the information is summarized below, and page numbers from Section 4.15 are referenced.

- Emergency access impacts associated with congestion is discussed on pages 4.15-52 and 4.15-53. There is not a direct relationship between predicted travel delay and response times, as drivers are required to yield the right-of-way to emergency vehicles; emergency vehicles can use opposing travel lanes; and the City has a Fire Preemption System that automatically turns traffic lights to green on designated streets. Other factors that make it complex and infeasible to exactly predict response times at the street level of geography: proximity of Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD) facilities to those they serve, responder staffing, use of alternative routes, specific street configuration, project specific mitigation requirements, the changing demand for service due to demographics, increasingly stringent regulations, and improved technology and deployment.
- LAFD has a Strategic Plan (2018-2020) in place, including Goal 1: Provide Exceptional Public Safety and Emergency Service. There are 16 strategies associated with this goal, such as improving emergency response times and fire suppression services, ensuring effective deployment of resources, preparing for large scale disasters, and ensuring an optimal state of readiness focusing on terrorism and disaster

preparedness. This is the department's follow-up strategic plan to a previous one released for the years 2015-2017. See pages 4.15-9 and 4.15-56.

- LAFD received funding in the City's 2019-20 budget to prepare a long-term resource deployment plan called Standards of Cover. The Standards of Cover is expected to determine the optimal distribution and concentration of resources and ensure a safe and effective response force for fire suppression, emergency medical services and specialty response situations. LAFD is currently preparing this plan, which is also expected to establish the department's response time standards and identify the facilities, equipment and staff to maintain appropriate response times, including the consideration of congestion as a factor. See pages 4.15-56, 4.15-59, and 4.15-60.
- The northern portion of the Hollywood Community Plan Area, which includes hillside communities, is located in a Very High Fire Hazard Severity Zone (VHFHSZ), as stated on page 4.15-54, and there is ongoing concern for the potential of brush and wildfires. LAFD has the state's strictest brush clearance regulations, and the City updated additional brush clearance requirements in 2018 (Ordinance 185789). Also stated on page 4.15-54, LAFD monitors the weather daily for wind and low humidity in order to determine Red Flag Days, and may pre-deploy personnel and resources, including access to a variety of air and ground apparatus, to prepare in the event of a fire. See also Master Response No. 9 related to hillside development under the Proposed Plan.
- Fire suppression is one facet of firefighting, but more than 85 percent of LAFD's daily responses are related to emergency medical services. As stated on page 4.15-56, LAFD has been acquiring new equipment and staffing, such as an Advanced Provider Response Unit in Hollywood that can provide some medical treatment in the field, and piloting health strategies to improve medical response.
- LAFD is implementing advanced technologies by developing performance metrics, tracking standards, collecting data, and analyzing data and procedures through a program called FireStatLA. As stated on page 4.15-57, LAFD's battalion chiefs and captains hold regular meetings to review FireStatLA data throughout the City, including response times, and adjust practices or identify other solutions to maintain response times. Construction and special events, which are generally known and planned in advance, are part of the consideration for emergency service.
- Data regarding response times is regularly updated through FireStatLA and is publicly available online. The response times are available by community-level geographies in the City; the data is also available for each fire station. Visit https://www.lafd.org/fsla/stations-map. The recirculated Section 4.15 provides the response times available during the preparation of the section. The tables regarding response times are provided on pages 4.15-54 and 4.15-59.
- Additional discussion regarding the perception and evolving assessment of response time standards based on a specific cardiac arrest study from 1979 is also provided on pages 4.15-58 and 4.15-59.
- The City's Emergency Management Department (EMD) in coordination with LAFD, LAPD, and the Department of Transportation (LADOT), assists in emergency action plans for special events. EMD has individual emergency plans, including for disasters and terrorism. EMD manages NotifyLA, the City's mass notification system used to provide information regarding necessary actions in cases of emergencies or critical situations. EMD also organizes disaster preparedness resource fairs and information for the public. Staff from EMD are regularly on call and respond when LAPD and LAFD notify them. See pages 4.15-56 and 4.15-57.

A few comments state that the staffing and equipment for Fire Station No. 41 in Table 4.15-5 on page 4.15-19 is incorrect or outdated. The information has been updated but it should be noted that this type of information is subject to change depending on what is available at a moment in time. The average annual response times for the year 2016 was updated in the recirculated Section 4.15; see Tables 4.15-13 through 4.15-15 on page 4.15-54. The average response times for the year 2017, 2018, and the first eight months of 2019 (what was available at the time of preparing the recirculated Section 4.15) are also in these tables.

Other sections of the EIR that discuss or relate to emergency services are Section 4.8, Hazards and Hazardous Materials and Section 4.14, Public Services. The Public Services section includes discussion of fire protection and emergency services, and police protection.

Section 4.8 includes an impact question on whether the Proposed Plan would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan on page 4.8-44. As stated in the EIR, the impacts are less than significant due to compliance with existing regulations, and construction that would use temporary barricades or other obstructions that could impede emergency access would be subject to the City's permitting process per LADOT and LAFD. Section 4.8 also discusses whether implementation of the Proposed Plan would expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. It is discussed on page 4.8-45 that areas located within a Fire Brush Clearance Zone and VHFHSZ continue to be at risk for wildfires and the Community Plan Area includes both developed hillside properties and undeveloped open space portions within a VHFHSZ. See **Figure 4.8-4** for a map of this area. Development opportunities are very limited in areas designated Open Space land use and hillside residential development is also limited in part because of slope density restrictions, topography, zoning regulations and the existing Hillside Construction Regulation (HCR) District. The Plan also includes an ordinance to expand the HCR District east of the Bird Streets and Laurel Canyon neighborhoods. The HCR District includes single-family hillside areas extending from the existing HCR districts east to Fern Dell Drive near Griffith Park, and includes Hollywoodland, the Oaks, and portions of Los Feliz. The expansion area would receive additional protections from construction-related impacts. The HCR has more restrictive grading limits, establishes hauling truck vehicle size limits and operation standards and limits construction operation hours.

The Proposed Plan would direct growth away from low-density neighborhoods, including hillside areas, and would not further expose people or structures to a significant risk of loss, injury or death involving wildland fires. Owners of properties located within VHFHSZ and Fire Brush Clearance Zones are required to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply, comply with provisions for emergency vehicle access and Red Flag Days, and follow building codes. Therefore, the impact conclusion is less than significant. See also Master Response No. 9 explaining that the Proposed Plan, which makes no land use or zone changes to allow any increases to housing in the hillsides will not cause or foreseeably result in development in the hillsides.

Evacuation is also discussed in the recirculated Section 4.15 on page 4.15-55, which states that it is the situational nature and direction of a fire that determines whether evacuation should occur. As discussed, sheltering in place may be a better strategy to keep roads free for LAFD access. LAFD regularly assesses evacuation routes during the year for changing conditions, such as access, and updates occur as needed. From time to time, evacuation exercises and drills are conducted to increase the preparedness and residents and the coordination between LAFD and other City departments, such as LAPD, EMD, and others, such as utilities providers and the American Red Cross. An evacuation exercise was conducted by LAFD's West Bureau commander for the hillside communities in Hollywood on November 16, 2019.

To the extent commenters argue that the methodology, data and standards the City relied upon for assessing impacts related to emergency access, impacts to emergency routes or evacuation routes or other hazards from the Proposed Plan are inadequate, the City used the best available data, standards, and methodology available as determined by the recommendations of the City's expert environmental consultants and discussions with LAFD, LAPD, and EMD. The City is not aware of better data, standards or methodology and the commenters have not provided substantial evidence to support their assertions that the City's data, standard or methodology lack substantial evidence or credibility.

Based on the above and the EIR, there is no basis to find a significant impact resulting from the Proposed Plan on transportation impacts related to emergency access or from hazards or impacts related to hazards, including as it relates to emergency access or evacuation route or wildfires.

Additionally, there are no significant impacts related to public services. Under public service impact analysis, increased demand for emergency services, including increased response time, does not by itself constitute a significant impact under CEQA. The EIR discusses response times and increased demand for emergency services; as indicated on page 4.14-12 of the EIR, these factors are not impacts to the physical environment that must be analyzed for significance or mitigated under CEQA. Rather, these are considerations among various factors in determining whether the Proposed Plan would foreseeably result in the construction of new or expanded fire or emergency facilities, which could cause significant impacts to the environment. Therefore, analysis of whether there is a significant impact related to emergency services is appropriately based on whether a significant environmental impact could result from the construction and operation of new or expanded facilities.

As discussed on pages 4.14-12 to 4.14-16 of the EIR, there are no current plans to build new stations or expand existing fire facilities and it would be speculative to identify any specific impacts associated with any potential new or expanded fire stations. Due to foreseeable increases in population, housing, and employment over a 20-year horizon, however, it is reasonably expected in general that there may be a need for new facilities. Construction activities would have the potential to temporarily increase demand on fire, police, and emergency medical services and lane or road closures could affect response times of emergency vehicles. However, development projects that will cause temporary road closures are required to submit plans to LA Department of Transportation to minimize impacts and large projects are required to create construction staging and traffic management plans consistent with LAFD requirements to ensure that emergency access is maintained. As previously discussed, LAFD may increase staffing levels, add new equipment, and use pilot programs to maintain appropriate response times to meet changes in demand. LAFD also assesses its resources regularly and evaluates the need for new fire stations based on projected growth, and reviews the potential impacts of an individual project's fire-related needs, such as other factors such as required fire-flow, response distance for engine and truck companies, fire hydrant sizing and access. For example, Fire Station No. 82 in Hollywood was upgraded to a regional facility and re-opened in 2012. LAFD has a mandate to protect public safety and must respond to changing circumstances and would act to maintain response times. The construction of a fire station would be similar to construction impacts already discussed throughout the impact sections of the EIR.

A similar analysis regarding police protection and facilities is provided on pages 4.14-25 to 4.14-26. The impact conclusion for both fire and police protection is less than significant. It is discussed on pages 4.14-23 that LAPD uses "Patrol Plan," a field deployment software that takes into account 25 separate factors, including crime data, population density, and traffic speeds, to respond to the need of increased demand associated with new development and/or population increases. Additionally, LAPD uses computer statistics (COMPSTAT) to determine crime prevention actions by analyzing statistical and geographical information systems to reduce the occurrence of crime and has building design guidelines to "Design Out Crime," which uses paths, lighting, and security features for natural surveillance to discourage criminal activity, as stated on page 4.14-18.

MASTER RESPONSE NO. 6 – DISPLACEMENT AND AFFORDABLE HOUSING

Summary of Master Response

- **The adoption of the Proposed Plan would not directly result in physical changes or reasonably foreseeable indirect effects that would result in physical changes, including the removal, demolition, or conversion of existing housing that would cause the displacement of a substantial number of housing or people necessitating the construction of housing elsewhere.**
- **The Proposed Plan would not result in the net loss of housing but is instead anticipated to result in a net gain of housing units in the Hollywood Community Plan Area.**
- **Loss of affordable housing and displacement of low-income renters is a social and economic impact, which is not a CEQA impact unless it results in a physical impact to the environment.**

- **Indirect displacement of renters may result in the need for people who live in the Plan Area to move outside the Plan Area or potentially outside of the City. But there is no substantial evidence that there is a reasonable method to predict how many people may potentially be displaced in the Plan Area over the Plan horizon. There is no industry standard methodology available to forecast transportation, air, noise, or other impacts associated with people who have left the Plan Area.**
- **The Proposed Plan does not conflict with existing incentive regulations requiring the provision of affordable housing in connection with new development. In addition, the Proposed Plan does not conflict with affordable housing replacement provisions required by state law and the City.**
- **The Proposed Plan incentivizes new affordable housing development by establishing the Hollywood Community Plan Implementation Overlay (CPIO) District, a zoning tool with regulations to help increase affordable housing in the CPA.**
- **The Proposed Plan also provides goals, policies, and programs that seek to prevent or minimize displacement of residents and increase affordable housing in the Community Plan document, which will guide the future vision for the Hollywood Community Plan Area through 2040.**

Comments

Multiple comments stated concerns regarding displacement of low-income residents as a result of demolition and new development, including the loss of rent stabilized ordinance (RSO) units; the need for more affordable housing under the Proposed Plan; and the assessment of some environmental impacts in connection with indirect displacement. A few comments expressed concern that existing multi-family RSO units are at increased risk of demolition and redevelopment because the Proposed Plan does not increase density in single-family residential areas and suggested that density in such areas be increased. Several comments stated that the Proposed Plan would favor hotel development by proposing additional FAR for hotels, which could spur redevelopment of some rent stabilized or affordable units. Comments about impacts to air quality and GHG emissions as a result of indirect displacement were also stated. Other comments mentioned Measure JJJ, which created the Transit Oriented Communities (TOC) Affordable Housing Incentive Program. Such comments questioned whether the Proposed Plan and EIR analysis incorporate or comply with Measure JJJ requirements and indicated that the EIR should acknowledge the Proposed Plan's inconsistency with Measure JJJ and other regulations. Multiple commenters requested that the Proposed Plan include additional goals, policies, and implementation programs that promote affordable housing, small businesses and local hiring. Comments also expressed the importance of developing and implementing regulatory mechanisms, including mitigation measures, that prevent displacement and increase the supply of housing, primarily affordable housing.

Response

Introduction

Proposed policies and zoning regulations have been updated in response to community concerns about affordable housing development, as also described in **Chapter 2.0, Modifications and Technical Refinements to the Plan and Environmental Effects**. The updated zoning regulations tie additional development potential, such as Floor Area Ratio (FAR) and density, in selected areas of the Community Plan Area to the provision of affordable housing. An incentive to grant additional FAR for hotel development is no longer proposed. For more information, see Updated **Appendix C**, Proposed Change Area Map and Change Matrix and Updated **Appendix E**: Proposed CPIO. Additional policies and implementation programs to preserve and promote affordable housing, RSO units, and local jobs were added to the Community Plan (see Updated **Appendix D**). A summary of how the Proposed Plan is addressing affordable housing with zoning regulations and policy is provided below.

Change in Housing Supply as a Result of the Proposed Plan

A net gain of housing units is reasonably foreseeable with the implementation of the Proposed Plan, as indicated in the Project Description and Section 4.13, Population, Housing and Employment. It is anticipated

that the Proposed Plan would result in a net increase of approximately 17,000 to 28,000 housing units (see Table 3-4, page 3-17 and Table 4.13-8, page 4.13-15). As stated on page 4.13-18, "[t]his range accounts for recent state and local incentives introduced in 2017 that incentivizes affordable housing in areas well served by transit." As stated on page 4.13-18, "[t]he Proposed Plan does not include any direct physical changes that require the removal or demolition of any existing housing units. All existing residential units are allowed to remain in place under the Proposed Plan." As explained on page 4.13-19, "existing residential units are not being displaced under the Proposed Plan and would not necessitate the construction of replacement housing elsewhere." The Proposed Plan includes updates to land use designations and zones that are intended to accommodate expected growth, primarily in central Hollywood and commercial corridors that are well served by Metro subway stations and bus lines. As a result, a net loss of housing units is not anticipated under the Proposed Plan but rather a net increase in housing supply, a portion of which is anticipated to be affordable housing units.

As indicated on page 4.13-19, "[i]n limited instances, however, the Proposed Plan could cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated or expanded. Even in areas where the Proposed Plan is not proposing active changes, this could occur, if individual property owners choose to demolish an existing residential building and redevelop to a more intense or dense development than existing currently. For example, an owner could decide to demolish an existing single-family house and build a four-plex on a parcel that allows for low-density multi-family residential housing. The indirect displacement of existing housing is not necessarily a CEQA issue unless it is shown that the displacement will cause an indirect impact to the physical environment. As identified in CEQA Guidelines Appendix G, the physical impacts could be from construction of new housing and the Proposed Plan's construction impacts. Construction impacts from construction of new housing would be similar to construction impacts analyzed in this EIR."

CEQA Requirements and Methodology

Several commenters suggested that the Proposed Plan should have mitigation measures for displacement of low-income residents and small businesses. In accordance with CEQA Guidelines Appendix G, a project would result in a significant impact if it would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Appendix G does not include a threshold of significance specifically related to the loss of affordable housing. Given these requirements, as indicated on EIR page 4.13-14, the following criteria are typically considered when determining the significance of a project with regard to the displacement of substantial numbers of existing housing or people:

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of a project, in terms of net loss of market-rate and affordable units;
- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
- The land use and demographic characteristics of a Project Area and the appropriateness of housing in the area; and
- Whether the Proposed Plan would be consistent with adopted City and regional housing policies such as the Framework and Housing Elements, the U.S. Department of Housing and Urban Development (HUD) Consolidated Plan and Comprehensive Housing Affordability Strategy (CHAS) policies, redevelopment plan, Rent Stabilization Ordinance, and the Regional Comprehensive Plan and Guide.

Recent development in the Hollywood Community Plan Area and the City of Los Angeles include infill development of sites with surface parking lots or commercial uses that do not contain any residential units as well as redevelopment of some properties that have existing housing. As indicated in the EIR on pages 4.13-19 through 4.13-21, "[t]he rising cost of housing is currently a concern throughout the City, reflective of the shortage of housing in the City and the region as a whole. As population growth continues to outpace the production of housing units, the existing supply of housing is in higher demand which leads to higher rents/prices. Many renters are experiencing financial strain as average rents rise, and would-be

homeowners watch as neighborhoods where home prices may have once been within their reach are growing prohibitively expensive. This occurrence may result in displacement of renters and may result in the need for people that live in the Plan Area to move outside the Plan Area or potentially outside of the City. But there is no substantial evidence that there is a reasonable method to predict how many people may potentially be displaced in the Plan Area over the Plan horizon. Additionally, there is no industry standard methodology available to forecast transportation, air, noise or other impacts associated with people who have moved out of the Plan Area. The City is looking at citywide responses to help relieve pressures on the housing supply (e.g., Affordable Housing Linkage Fee, Accessory Dwelling Units Ordinance, Unapproved Dwelling Unit Ordinance, etc.). As properties are redeveloped in the Community Plan Area, there could be temporary displacement of housing units due to the separation of time between removal and replacement of housing. This impact would be temporary, is expected to be spread over the timeframe of the Proposed Plan and would be offset by overall increases in housing development under the Proposed Plan."

As discussed in the EIR on page 4.13-20, "[d]isplacement of low-income renters is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact.[22] To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guidelines would be invalid.[23] Thus, an impact from loss of affordable housing and displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from the construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts.[24] To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative, impacts resulting from social and economic impacts.[25]" None of the comments submitted to the City have provided substantial evidence to support an impact will result to the environment from the displacement of people or housing from the Proposed Plan.

Mitigation measures are not required when environmental impacts are determined to be less than significant. The impact conclusions for Section 4.13, Population, Housing and Employment, are all less than significant and therefore, mitigation is not required. As discussed below, the Hollywood CPIO District is the new zoning tool for attracting and implementing more affordable housing in the Community Plan Area.

Proposed Plan and Affordable Housing Zoning Incentives

The City's Rent Stabilization Ordinance generally applies to rental housing units that were built on or before October 1, 1978 and replacement units of demolished RSO rental units (LAMC Section 151.28); single-family homes (one dwelling built on one lot) are exempt. A majority of single-family zoned lots in the Hollywood Community Plan Area are located in the hillsides or within a Historic Preservation Overlay Zone (HPOZ), where additional development potential would not meet the project objectives of the Proposed Plan,

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[22] *Porterville Citizens for Responsible Hillside Dev. v City of Porterville* (2007) 157 CA4th 885, 903 (claimed impact of new homes on existing home values is economic impact).

[23] *Porterville at 903; Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1205; CEQA Guidelines, Section 15131, subd. (a); *Gabric v City of Rancho Palos Verdes* (1977) 73 CA3d 183, 200 (city's refusal to approve negative declaration was abuse of discretion because evidence that construction of residence would affect character of neighborhood is not evidence of environmental impact that would require EIR); *CBIA v. BAAQMD*, 2 Cal. App. 5th 1067, 1083 (2016) ("CEQA cannot be used by a lead agency to require a developer … to obtain an EIR or implement a mitigation measures solely" based on threshold of significance that does not call for a CEQA impact.)

[24] CEQA Guidelines Sections 15064(e); CEB, Practice under the California Environmental Quality Act, Section 6.36.

[25] CEB, Practice under the California Environmental Quality Act, Section 6.36; Public Resources Code Section 21065; *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1020 (rejecting an argument that an initial study was required to analyze speculative physical impacts resulting from competition with retail tenant).

which include protecting historical and cultural resources and hillsides. Redevelopment of properties with RSO units is occurring without the Proposed Plan, in part due to pent up demand and market conditions. Where existing RSO units could be displaced by a new project, including ones that use affordable housing incentives, such a project would be required to comply with the housing replacement provisions of California Government Code Sections 65915 and 65915.5 as amended by Assembly Bill (AB) 2222 (see EIR page 4.13-3 for a summary of these code sections). Approved in 2014, AB 2222 requires that Cities provide developers with density bonuses and other incentives for the production of lower income housing units and requires continued affordability for 55 years. All affordable units existing on a development project site (including vacated or demolished units within a five-year period prior to the project's application date) must be replaced on a one-for-one basis. This would be done in coordination with the Housing and Community Investment Department's (HCIDLA's) Affordable Unit Determination application process. In addition to one-for-one replacement, the affordability period of the existing Rent Stabilization Ordinance (RSO) units or other affordable units would then be extended up to 55 years, significantly extending the life of their affordability. Additionally, the Housing Crisis Act of 2019, provides through January 1, 2025, no development can result in a loss of housing units, affordable housing units under a recorded covenant or rent control must be replaced and displaced tenants must be provided relocation costs (Government Code Section 65300).

Under the Proposed Plan, new housing development is expected in commercial and multi-family residential areas near transit, where the zoning is changing to generally allow for more FAR. These areas are primarily zoned commercial with commercial uses, but there are some existing housing because housing units are allowed in commercial zones. There are also a few multi-family zoned areas (Subareas 22 and 41 for example) where additional housing potential would occur under the Proposed Plan; these areas are near Metro subway stations and/or job centers. However, in order to seek additional residential units under the Proposed Plan in these selected multi-family residential areas, applicants would need to provide specified affordable housing levels and percentages as part of the project. The Hollywood CPIO District is the zoning tool that establishes the affordable housing incentive system in the Community Plan Area and is the mechanism for how the Proposed Plan would increase affordable housing. It includes a local incentive system to replace the Citywide Transit Oriented Communities (TOC) (LAMC Section 12.22 A.31) guidelines. Within each type of CPIO Subarea (Regional Center, Corridors, Multi-family Residential, and Character Residential), there are tailored affordability percentage levels and incentives. See the Updated **Appendix E** for details.

The Proposed Plan would allow additional housing units to be built with the provision of affordable housing in selected commercial and multi-family residential areas of Hollywood, generally near transit systems and/or job centers by providing incentives, such as increased density, additional FAR, and reduced residential parking. Other incentives such as height increases, reduced setbacks, and reduced commercial parking are also possible, depending on the level and percentage of affordable units provided on site. Hotels were previously proposed to receive additional FAR incentives when the Proposed Plan was released in 2018. The zoning incentives have been revised since then and hotels will not receive any additional FAR incentives. Hotel projects seeking additional development rights are subject to applicable LAMC sections. Within the CPIO's Multi-family Residential subareas, new hotels are not allowed in order to prioritize housing units, either through the preservation of existing housing or the development of new housing. Within the CPIO's Regional Center subareas, new hotels that remove existing housing units will be required to seek a Conditional Use Permit. The Proposed Plan, when published in 2018, also included FAR incentives for developments containing both residential and non-residential uses along selected commercial corridors near transit systems. Over time, mixed-use development has occurred without a need to incentivize this type of development in the CPA. Instead, applicants seeking development incentives in CPIO subareas under the Proposed Plan would need to provide affordable housing consistent with the CPIO regulations. A mixed-use project, with commercial and residential uses, could seek additional zoning incentives by providing affordable housing through the CPIO. Applicants could also seek additional development through the discretionary entitlement process, such as a zone change, which may trigger Measure JJJ depending on the

individual development project, as discussed on page 4.13-8. Certain types of discretionary projects would serve to limit the construction of luxury and/or 100 percent market rate housing projects and could result in an overall increase in the number of affordable units in the CPA.

The comprehensive assessment of the Proposed Plan in relation to Measure JJJ is discussed in the CPC-2016-1450-CPU Staff Report. For more information, please refer to the CPC-2016-1450-CPU Staff Report. The purpose of the comprehensive assessment is to ensure that any changes to the City's community plans do not: (a) reduce the capacity for creation and preservation of affordable housing and access to local jobs; or (b) undermine California Government Code Section 65915 or any other affordable housing incentive program.

Accessory dwelling units (ADU) and junior accessory dwelling units (JADU) are allowed on lots within a residential, including single-family zoning, and mixed-use zone per the City's Ordinance 186481, which was adopted in December 2019. ADUs located in a Very High Fire Hazard Severity Zone and a Hillside Area have additional requirements. Off-street parking is required for these ADUs, which must also install automatic fire sprinkler systems. In addition, the roadway of the subject property must be improved and be at least 20 feet wide along the entire frontage of the property, after any dedication and improvement.

Proposed Plan Policies and Programs

The Proposed Plan is consistent with adopted City and regional housing policies designed to protect low-income housing and provide relocation assistance for displaced households. Additionally, the General Plan Framework and Housing Elements contain objectives and policies that would help to minimize the risk of permanent displacement of substantial numbers of existing housing units. The Community Plan (included in the Updated **Appendix D** of the EIR) includes goal, policies, and implementation programs that support additional affordable housing development and seek to minimize displacement of residents. Since the EIR was published in 2018, additional policies and implementation programs to encourage affordable housing development and prevent displacement have been proposed in response to comments received. Policies and programs that support small businesses, local hiring, and mobile vending have also been added. These goals, policies, and programs are presented in **Table MR2-1**.

TABLE MR2-1: PROPOSED HOLLYWOOD COMMUNITY PLAN AFFORDABLE HOUSING AND DISPLACEMENT GOALS, POLICIES, AND PROGRAMS

Goal/Policy/Program	Description
Policy LU3.4	Maintain affordable housing through renovation. Encourage renovation of affordable housing stock to maintain historic neighborhood integrity and minimize displacement of residents.
Policy LU3.5	Neighborhood Investment. Guide the design of new buildings and the rehabilitation and repair of existing buildings to foster neighborhoods that are attractive and livable.
Goal LU5	Multi-family residential neighborhoods that provide a range of housing opportunities at a variety of price points, including affordable housing, through a mix of ownership and rental units.
Policy LU5.1	Individual choice and affordability. Provide a variety of rental and ownership housing opportunities for households of all income levels, sizes, and needs, including middle income and workforce populations. (P99)
Program 99	Promote the use of available homebuyer programs that make purchasing a single-family home affordable such as the California Housing Finance Agency's First-time Homebuyer Program.
Policy LU5.2	Home Ownership for Diverse Groups. Encourage greater access to homeownership of adequate housing for all persons regardless of income, age, and cultural, racial or ethnic identity.
Policy LU5.3	Housing for Families. Promote family-friendly projects that include more bedrooms suitable for larger families. (P100)

TABLE MR2-1: PROPOSED HOLLYWOOD COMMUNITY PLAN AFFORDABLE HOUSING AND DISPLACEMENT GOALS, POLICIES, AND PROGRAMS	
Goal/Policy/Program	**Description**
Program 100	Coordinate with HCIDLA to create strategies for the provision of more bedrooms in new housing developments which are suitable for larger families.
Policy LU5.4	Mixed-income neighborhoods. Promote the distribution of mixed income housing opportunities throughout the Plan area to avoid the over-concentration of low-income housing. (P101)
Program 101	CPIO provides incentives for the development of affordable housing near public transit areas, along commercial corridors that are well-served by transit and in close proximity to jobs, services and facilities.
Policy LU5.5	Affordable housing and transit. Encourage affordable housing near transit.
Policy LU5.6	Senior Housing. Encourage that adequate affordable housing units for senior citizens are developed according to incomes in neighborhoods that are accessible to public transit, commercial services and health facilities.
Policy LU5.8	Permanent supportive housing. Encourage the construction of permanent supportive housing for the homeless through the master leasing of private apartment blocks, the purchase of for-profit single room occupancy hotels, and the conversion of short-term emergency shelter facilities.
Policy LU5.9	Transitional Housing. Support the development of transitional housing units and emergency shelters that are appropriately located within the Community Plan Area. (P102)
Program 102	The Plan is consistent with the goals and policies of the City's Housing Element in supporting efforts to address homelessness.
Policy LU5.10	Maintain affordable housing. Encourage the replacement of demolished or converted affordable housing stock with new affordable housing opportunities while minimizing the displacement of residents, through programs that support development while meeting the relocation needs of existing residents.
Policy LU5.11	Address Diverse Resident Needs. Provide for the preservation of existing housing stock and for the development of new housing to meet the diverse economic and physical needs of existing residents and the projected population of the Community Plan Area to the year 2040. (P103)
Program 103	Work with HCIDLA, Council Offices, City Attorney and other relevant City Agencies to explore the creation of a no net loss program that minimizes the displacement of residents and ensures that there is no loss of covenanted affordable rental housing or the production of new affordable housing.
Policy LU5.12	Affordability. Encourage affordable housing options by promoting the benefits of tax credit programs such as LAHD's Mortgage Credit Certificate program, homebuyer incentive programs that involve the reuse and rehabilitation of existing structures, other tax programs and the density bonus ordinance.
Policy LU5.13	Preserve Rent Stabilized units. New development should aim to minimize displacement of current residents and strive for a no net loss of covenanted affordable units in the Plan Area and discourage the displacement of existing residents. (P103)
Program 103	Work with HCIDLA, Council Offices, City Attorney and other relevant City Agencies to explore the creation of a no net loss program that minimizes the displacement of residents and ensures that there is no loss of covenanted affordable rental housing or the production of new affordable housing.
Policy LU5.14	Minimize Displacement. Decrease displacement of current residents and strive for a no net loss of covenanted affordable housing units, including those protected by the Rent Stabilization Ordinance. (P103, P104, P105, P106, P107)
Program 103	Work with HCIDLA, Council Offices, City Attorney and other relevant City Agencies to explore the creation of a no net loss program that minimizes the displacement of residents and ensures that there is no loss of covenanted affordable rental housing or the production of new affordable housing.
Program 104	The Los Angeles Housing and Community Investment Department will monitor the inventory of units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households.

TABLE MR2-1: PROPOSED HOLLYWOOD COMMUNITY PLAN AFFORDABLE HOUSING AND DISPLACEMENT GOALS, POLICIES, AND PROGRAMS	
Goal/Policy/Program	**Description**
Program 105	Continue to proactively enforce the citywide RSO and explore new approaches for protecting tenants from displacement.
Program 106	Monitor the implementation of policies and programs relating to affordable housing and/or rental housing issues and opportunities.
Program 107	Develop strategies to prevent and recover affordable housing loss, such as annual reports on existing affordable housing inventory and Ellis Act evictions, as well as specific programs and investments to prevent further loss of covenanted affordable units and steps to increase affordable housing production in the Plan Area.
Policy LU5.15	Tenants' Rights of Return. Support projects that offer former low income tenants of demolished units with the first right of refusal on leases for the new housing units. (P108)
Program 108	Support HCID in exploration of a future effort to establish new programs and strengthen existing programs to provide former low income tenants of demolished or converted units with the first right of refusal on leases for new housing units.
Policy LU5.16	Strategic Use of Public Property. Encourage the use of public property and joint development to create 100 percent affordable and/or supportive housing projects. (P109)
Program 109	Support the re-use of former CRA-owned and surplus City-owned property in Hollywood for community uses, prioritizing affordable housing and park space.
Policy LU5.17	Cohousing. Amend regulations to facilitate innovative multi-family housing types such as "cohousing" and other non-traditional housing types where significant neighborhood support is indicated. (P110, P111)
Program 110	Support the goals and policies of the City's Housing Element to facilitate non-conventional housing that fosters neighborhoods which are livable and sustainable for all segments of the community.
Program 111	Work with relevant City agencies to explore the initiation of cohousing purchase opportunities that require noticing requirements for property owners that intend to sell or redevelop multifamily residential or commercial properties and provides existing tenants the opportunity to match the recorded offer price to co-purchase or co-develop the property.
Policy LU 5.18	Off-Site acquisition options. Coordinate with non-profits, community-land trusts, and affordable housing developers to take advantage of off-site acquisition options.
Policy LU5.19	Coordination with Community Based Organizations. Foster effective collaboration and coordination between City departments and tenant organizations working in the Community Plan Area to more quickly identify displacement and eviction threats and more efficiently respond with adequate resources and strategies.
Policy LU6.10	Small Business Retail Space. Encourage mixed-use and commercial developments to provide retail spaces conducive to community-serving small businesses and business incubation. (P115, P128)
Program 115	Develop partnerships to create business outreach programs targeting local schools for student participation in business apprenticeship and internship programs, as well as work with LAUSD's Mentorship Programs.
Program 128	Continue to develop and promote agency programs that assist small business owners and entrepreneurs in the form of low-interest loan programs, management assistance, business retention efforts, and the establishment of incubation centers.
Policy LU6.11	Support Neighborhood Establishments. Support existing neighborhood stores (i.e. mom-and-pop establishments) that support the needs of local residents, are compatible with the neighborhood and create a stable economic environment. (P116)
Program 116	Increase the availability of resources to finance small business startup/expansion for local entrepreneurs committed to benefitting the local community. Explore and enhance resources to finance development that is committed to leasing to local and less-credit-ready small businesses.
Policy LU6.12	Local employment. Ensure that neighborhoods are well connected to adjacent employment areas that provide services, amenities, and employment opportunities to the local community.
Policy LU9.1	Jobs and housing near transit. Incentivize jobs and housing growth around transit nodes and along transit corridors.

TABLE MR2-1: PROPOSED HOLLYWOOD COMMUNITY PLAN AFFORDABLE HOUSING AND DISPLACEMENT GOALS, POLICIES, AND PROGRAMS	
Goal/Policy/Program	**Description**
Policy LU9.2	Affordable housing near transit. Encourage new affordable housing near transit in the Regional Center. (P16, P101, P103, P107)
Program 16	Create incentives for affordable housing units in the Regional Center by providing additional FAR in exchange for units reserved for Low Income and Very Low Income tenants based on Area Median Income.
Program 101	CPIO provides incentives for the development of affordable housing near public transit areas, along commercial corridors that are well-served by transit and in close proximity to jobs, services and facilities.
Program 103	Work with HCIDLA, Council Offices, City Attorney and other relevant City Agencies to explore the creation of a no net loss program that minimizes the displacement of residents and ensures that there is no loss of covenanted affordable rental housing or the production of new affordable housing.
Program 107	Develop strategies to prevent and recover affordable housing loss, such as annual reports on existing affordable housing inventory and Ellis Act evictions, as well as specific programs and investments to prevent further loss of covenanted affordable units and steps to increase affordable housing production in the Plan Area.
Policy LU9.6	Diverse and Affordable Housing. Prioritize housing that is affordable to a broad cross-section of income levels, that provides a range of residential product types, and that supports the ability to live near work. (P112, P113)
Program 112	Support efforts to identify potential funding sources for 100% affordable housing developments including permanent supportive housing.
Program 113	Collaborate with Economic Workforce Development Department to support efforts to provide business outreach and mentorship programs.
Policy LU9.7	Local Jobs. Maintain and increase the commercial employment base for community residents, including those facing barriers to employment, through local hiring, living wage provisions, job resource centers and job training. (P113, P115, P147)
Program 113	Collaborate with Economic Workforce Development Department to support efforts to provide business outreach and mentorship programs.
Program 115	Develop partnerships to create business outreach programs targeting local schools for student participation in business apprenticeship and internship programs, as well as work with LAUSD's Mentorship Programs.
Program 147	Study/develop a prequalification process that evaluates contractors on their record and commitment to high road wage and benefit standards and local hire training.
Policy LU9.8	Minimize Displacement of Small Businesses. Encourage the retention of existing small businesses that strengthen the local economic base of the Community Plan Area. (P114)
Program 114	Coordinate with relevant departments such as CAO, EWDD, and others to explore the creation of a Good Jobs Zone which could include incentives for small business retention, finance tools, first source referral, among other components.
Policy PR2.9	Mobile Vending. Encourage and support mobile vending in plazas and along streets surrounding major transit stations, where permissible by County and City Law, as part of fostering a vibrant pedestrian environment. Consider supportive services such as commissary kitchen when considering public benefit agreements. Consider re-examining areas where street vending is not permissible.
SOURCE: City of Los Angeles. *Draft Hollywood Community Plan*, 2021.	

Conclusion

The EIR concludes that impacts related to displacement would be less than significant, as the adoption of the Proposed Plan would not directly result in physical changes that would cause the displacement of a substantial number of housing or people. No existing residential units are proposed to be demolished, converted to market rate, or removed through other means as part of the Proposed Plan.

The Proposed Plan's new land use and zone changes will apply to future development projects that do not exist yet. Once implemented, it is possible in limited instances for the Proposed Plan to cause a temporary

reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated. The indirect displacement is not necessarily a CEQA issue unless it is demonstrated that the displacement will cause an indirect impact to the physical environment. Physical impacts could be from construction of new housing, and impacts from construction of new housing would be similar to construction impacts analyzed in the EIR. It could also be from transportation or other impacts related to people driving a farther distance, but an analysis of such indirect physical impacts requires substantial evidence. The EIR discloses that there is not a reasonable method to predict how many people may potentially be displaced in the Community Plan Area over the Plan horizon of approximately 20 years or where they would be displaced, they may move somewhere else in the City, to a neighboring City, County, another part of the State or Country. Also at this time, there is no industry standard for forecasting transportation, air, noise or other impacts associated with people who have moved out the Plan Area or any other methodology the City is aware of to analyze these impacts. Once the Proposed Plan is in effect, additional affordable housing units are expected through the implementation of CPIO zoning incentives. Therefore, any impacts related to displacement of persons or housing units by the Proposed Plan would be speculative.

Overall, the total housing stock, including affordable housing units, is anticipated to increase under the Proposed Plan. The Proposed Plan allows for a variety of housing types, encourages new housing in commercial areas and multi-family residential areas near transit systems, and increases affordable housing units through the CPIO's affordable housing zoning incentives. The Proposed Plan also includes goal, policies, and implementation programs that support additional affordable housing development and seek to minimize displacement of residents. Therefore, it is reasonably anticipated for the Hollywood Community Plan Area to gain a net increase of housing and affordable housing units, over the Plan horizon, through the year 2040.

MASTER RESPONSE NO. 7 – BIOLOGICAL RESOURCES

Summary of Master Response

- **The EIR evaluates impacts of the Proposed Plan on biological resources for the entire Project Area, including the Santa Monica Mountains east and west of US-101, Griffith Park SEA, Hollywood Hills, Los Angeles River, foothills, and flatlands within the Plan Area.**
- **Discretionary projects in or within 200 feet of Griffith Park are required to comply with the City's Baseline Hillside Ordinance, which includes the Santa Monica Mountains east and west of US-101 and would be required to comply with Mitigation Measures BR-1, BR-2, and BR-6 in the EIR.**
- **Discretionary projects located on sites with jurisdictional waters, wetlands, seasonal or perennial streams, and/or riparian habitat would be required to comply with Mitigation Measures BR-3 through BR-5.**
- **Biological resources information contained in the Wildlife Pilot Study is not added to the EIR because it does not identify sensitive species that occur in the Plan Area. Additionally, the wetlands, streams, and riparian habitat information contained in the study are preliminary based on limited available data and are subject to change.**
- **Most of the discussion of biological resources in the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* is generalized and extends beyond the Plan Area. It does not specifically identify the wetlands, streams, riparian habitat, and wildlife corridors that are specifically found within the Plan Area. The sensitive species that the document identified to have occurred in the Plan Area are already discussed in Section 4.4, Biological Resources, of the EIR. Additionally, the discussion in the study is generally consistent with the discussion in the EIR for the Proposed Plan.**
- **The discussion of streams and wetlands in the EIR applies to all streams and wetlands in the Santa Monica Mountains portion of the Plan Area. Nichols Canyon is one of many streams that can be found in the Santa Monica Mountains.**

- **Commenters provide no substantial evidence supporting the need for a substantially revised analysis of biological resources or revised conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).**

Summary of Comments

Several comments suggest that the EIR discussion of biological resources is inadequate and that it does not provide enough detail to allow for the identification of potential impacts. One comment indicates that the EIR does not adequately describe or provide mitigation measures for biological resources impacts in parts of the Plan Area near Griffith Park; several comments indicate that the analysis of the Santa Monica Mountains west of US-101 and I-5, including the Hollywood Hills, is inadequate and not detailed enough because it does not adequately address the high levels of wildlife, habitat, and the potential for sensitive species in these areas. The comments assert that a biological resources assessment needs to be prepared for the EIR.

One comment points out that Mitigation Measures **BR-1** and **BR-2** only apply to discretionary projects in or within 200 feet of Griffith Park. A few commenters express their opinions that mitigation measures should include the Hollywood Hills west of US-101.

Several comments question why the EIR does not reference the motion passed by the City Council Planning and Land Use Management (PLUM) Committee in April 2016 to create a wildlife corridor in the eastern area of the Santa Monica Mountains (between I-405 and US-101) and the City's subsequent Wildlife Pilot Study. Several comments indicate that the Biological Resources section of the EIR should include findings from the Wildlife Pilot Study and the Rim of the Valley Corridor Special Resources Study with respect to wildlife habitats, sensitive species, wetlands, streams, riparian habitat, and wildlife corridors. One commenter indicates that the approved action items from the PLUM Committee and feasible mitigation measures identified in the Wildlife Pilot Study should be included as mitigation measures in the EIR.

Several comments indicate that the East Santa Monica Mountain Habitat Linkage Map of the SMMC should be discussed in the EIR. One comment indicates that the EIR should include a description and a map of the portion of the Eastern Santa Monica Mountain Habitat Linkage Planning Map that covers the Project Area.

A few comments indicate that the EIR should discuss the presence of, importance of, and impacts to Nichols Canyon Stream.

Response

EIR Analysis and Mitigation Measures

The EIR for the Proposed Plan evaluates, programmatically, impacts on biological resources for the entire Plan Area, including the hillsides, foothills, flatlands, and the Los Angeles River. The developed and undeveloped areas of the Santa Monica Mountains that are within the Project Area and analyzed in the EIR, include the areas west of US-101 and east of US-101 and the areas near Griffith Park. The Plan Area analyzed in the EIR also includes the Hollywood Hills.

Section 4.4, Biological Resources, of the EIR describes the types of wildlife and habitats that are found within the Plan Area, acknowledges that many wildlife species can be found in the Santa Monica Mountains within and adjacent to the Plan Area on page 4.4-7 of the EIR, and that the Santa Monica Mountains within and to the west of the Plan Area are part of a larger wildlife corridor encompassing the Santa Monica Mountain Range on pages 4.4-13 and 4.4-29 of the EIR. While some wildlife in the Plan Area have adapted to urban areas, such as raccoons, deer, and coyotes, urban development in the surrounding area is inhospitable for species that are sensitive to human activity and habitat disturbance. Developed urban areas, such as along Sunset Boulevard, Hollywood Boulevard, and Franklin Avenue, currently interfere with the movement of native resident, migratory fish, and wildlife species between the Santa Monica Mountains and

other undeveloped open spaces areas in the Plan Area, such as the Verdugo Mountains. The restricted wildlife movement in the urbanized portions of the Plan Area is not expected to significantly change with the increased development potential that is anticipated under the Proposed Plan. The Proposed Plan does not involve changes that would increase development density in the Santa Monica Mountains portion of the Plan Area, which is the portion of the Plan Area where the majority of the wildlife species is found and where most wildlife movement occurs. Open space areas would continue to be designated for open space and development is generally not allowed, although limited development could occur (see page 4.4-18 of the EIR). As discussed in the EIR, disturbance to undeveloped open space areas in the Santa Monica Mountains and in proximity to the Los Angeles River during the lifetime of the Proposed Plan could occur as a result of this limited development and could interfere with wildlife movement. (See also **Master Response No. 9** providing that the Proposed Plan is not expected to cause development in the hillsides.)

While the EIR provides a general description of the types of biological resources that are found in the Plan Area, the discussion in the EIR (including the discussion for Impact 4.4-1) as required by CEQA, focuses on candidate, sensitive, or special status species that occur in the Plan Area and how the Proposed Plan would affect these species. The discussion of candidate, sensitive, or special status species within the Plan Area includes the Santa Monica Mountains, Los Angeles River, foothills, and the urbanized flatlands portion of the Plan Area. The EIR also explains that riparian habitats, wetlands, and streams within the Plan Area can be found along portions of the Los Angeles River near the I-5/SR-134 interchange and in the Santa Monica Mountains within and surrounding the Plan Area. While undisturbed open space areas west of US-101 and the area surrounding Griffith Park support biological resources, the EIR specifically identifies Griffith Park because a majority of the park is designated as a Significant Ecological Area (SEA) and wildlife movement in this portion of the Plan Area is generally limited to the hillside areas between US-101 and I-5, although wildlife can use the bridges over US-101 near the Hollywood Reservoir to access the hillsides west of US-101 and the bridges and concrete channels of the Los Angeles River to connect to the Tujunga Valley/Hansen Dam SEA and the San Gabriel Mountains. An area, such as the Griffith Park SEA, is designated as an SEA if it contains a concentration of irreplaceable biological resources.

Because the Santa Monica Mountains supports significant biological resources, the mitigation measures provided in the EIR require a biological resources assessment report for discretionary projects within the Santa Monica Mountains and in adjacent areas to ensure that sensitive species with the potential to be impacted are documented and protected. Mitigation Measure **BR-1** requires that, "for discretionary projects in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance, project applicants shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species." Mitigation Measure **BR-2** requires focused surveys for special status plants if the biological resources assessment report required by Mitigation Measure **BR-1** indicates it as appropriate and the relocation of the special status plants identified in the focused surveys. Mitigation Measures **BR-1** and **BR-2** would ensure that sensitive species that have not yet been documented on individual project sites in these portions of the Plan Area be identified and protected. Mitigation Measure **BR-6** requires that the biological resources assessment analyze how individual development projects could affect wildlife corridors and identify measures to protect existing wildlife corridors. Since development within the Santa Monica Mountains portion of the Plan Area is required to comply with the Baseline Hillside Ordinance, these mitigation measures apply to all discretionary projects in the Santa Monica Mountains portion of the Plan Area, including the Hollywood Hills and the areas to the east and west of US-101. The mitigation measures would also apply to other hillside areas in the Plan Area.

Mitigation Measures **BR-3** through **BR-5** would also apply to the Santa Monica Mountains portion of the Project Area if a discretionary project occurring in the area would affect jurisdictional waters, riparian habitat, streams, wetlands, and/or other water bodies.

While several comments indicate that biological impacts are understated, the EIR determined that with implementation of mitigation measures, significant and unavoidable impacts on special status species habitat, riparian habitat, wetlands, and wildlife corridors would remain. The significant and unavoidable impacts apply to the entire Plan Area, including all portions of the Santa Monica Mountains within the Plan Area to the east and west of US-101, other hillside areas, foothills, and flatlands. As explained on page 4.4-25 of the EIR, the City recognizes that although the mitigation measures would apply to discretionary projects within or near portions of the Plan Area that contain sensitive biological resources, it would be unjustified, difficult, and require an inordinate amount of staff time and resources to capture the small number of discretionary projects in the urbanized portion of the Plan Area, as well as ministerial projects, that could have significant biological impacts. For this reason, the EIR concluded that the Proposed Plan would have a significant and unavoidable impact on candidate, sensitive, or special status species; wetlands; riparian habitats; and wildlife corridors.

Sensitive Species

The California Natural Diversity Database (CNDDB) was used to identify sensitive species that have been documented to occur within or in the vicinity of the Plan Area. CNDDB is managed by the California Department of Fish and Wildlife (CDFW) and identifies historical occurrences of plants, animals, and communities listed by CDFW, USFWS, local agencies, or special interest groups recognized by CDFW (such as California Native Plant Society [CNPS]) as rare, threatened, endangered, or otherwise considered species of special concern. Table 4.4-2 of the EIR identifies the plant and animal species that are listed on the CNDDB. The special status species listed in this table include those that have been documented to occur in the Santa Monica Mountains west and east of US-101, as well as in the urbanized foothills and flatlands of the Plan Area. The table includes special status species that are presumed or possibly extant and extirpated.

The EIR discusses how the Proposed Plan would affect each of the threatened species, endangered species, species of special concern, and other sensitive species that are documented to have occurred in the Plan Area. As discussed in the EIR, the CNDDB documented Nevin's barberry as being found in Griffith Park, which is located west of I-5 and east of US-101; Braunton's milk-vetch as being historically found in the Santa Monica Mountains and foothills in the westernmost portion of the Project Area (i.e., west of US-101); the silvery legless lizard and San Diego desert woodrat as being located in Forest Lawn – Hollywood Hills (which is located west of I-5); the southern California rufous-crowned sparrow as being located in the undeveloped Santa Monica Mountains east of US-101 (i.e., west of I-5); the Parish's brittlescale, mesa horkelia, slender mariposa-lily, and Plummer's mariposa-lily as being located east of US-101 (i.e., west of I-5); and many-stemmed dudleya as being located in the foothills between Vermont and Western Avenue (which is located west of I-5) and in the Hollywood Hills (which is located west of US-101). The locations where these sensitive species have been documented to have occurred are discussed on pages 4.4-19 through 4.4-22 of the EIR. Based on the species habitat, locations in which these species have been documented to occur in the Project Area and its vicinity, the types of development that exist in the area where the species have been documented to be found, and the type of land use changes included the Proposed Plan, the EIR determined the likelihood that the Proposed Plan would affect each these species (see pages 4.4-19 through 4.4-23 of the EIR) and concluded that after mitigation the Proposed Plan would result in a significant and unavoidable impact with respect to candidate, sensitive and special status species.

Given the size of the Plan Area, it is infeasible to prepare a detailed biological resources assessment and to identify every sensitive species within the Plan Area. Future development under the Proposed Plan would occur incrementally over time. Additionally, it is speculative to determine how individual development projects would affect each sensitive species in the Plan Area since the specific uses associated with all future individual development projects and the specific location of each individual project that would occur through the year 2040 are not known at this time. Because it is currently unknown how individual projects would affect sensitive species, the mitigation measures provided in Section 4.4, Biological Resources, protect sensitive species in areas where they are likely to occur, such as areas that are required to comply with the City's Baseline Hillside Ordinance (which includes the Santa Monica Mountains west and east of US-101

and Hollywood Hills), Griffith Park, and areas potentially containing jurisdictional waters and riparian habitat.

Santa Monica Mountains Habitat Linkage Map

The East Santa Monica Mountain Habitat Linkage Map has not been included in the EIR because the City found that the map cannot be supported with substantial evidence as there is no information to verify that the map was prepared by biologists and was prepared using methods and techniques to ensure the accuracy and completeness that would make it a reliable source to identify wildlife corridors.

SMMC is a State agency established by the Legislature in 1980 to plan for and preserve the "Zone," an area overlying a significant portion of west Los Angeles County and southeast Ventura County. The Zone contains parkland, open space, recreational trails and facilities, and wildlife and other biological resources interspersed throughout the urban and suburban landscape of Southern California. A major portion of the parkland area within the Zone is part of the federal Santa Monica Mountains National Recreation Area; the remainder consists of land held and operated by SMMC, other state and local agencies, and private landowners.

Pursuant to the SMMC Act, the Legislature determined that the Zone "is a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations… and that the preservation and protection of this resource is in the public interest" (PRC Section 33001). The Legislature further determined that a State agency was necessary to plan for the Zone due to "existing problems of substandard lots, incompatible land uses, conflicts with recreational use, and inadequate resource protection which, in some cases, cannot be addressed in a feasible manner by local government exercise of the police power or federal land acquisition" (PRC Section 33008, subdivision (a)).

Under this mandate, SMMC is authorized to acquire property for parkland, trail, conservation, and similar uses within the Zone (PRC Sections 33203-33204). It may award grants or issue loans to other state and local agencies to acquire such property (PRC Section 33204). It may award grants to agencies and non-profit organizations "to carry out improvements, maintenance, acquisitions, or educational interpretation programs that directly relate to" a District project (PRC Sections 33204.2-33204.27). SMMC may also enter into agreements with local districts for the expenditure of district funds consistent with open-space purposes (PRC Section 33207.7).

However, neither statute nor case law specifically authorizes SMMC to issue "official" State maps of wildlife corridors within the Zone (or indeed maps of the Zone generally) which the City is in turn required to incorporate into its own planning or environmental review processes. By contrast, and as discussed below, the Legislature has specifically required other State agencies (i.e., Fish and Wildlife) to prepare wildlife corridor maps and share the data and analysis underlying those maps with the public.

In January 2017, SMMC adopted a map entitled "Eastern Santa Monica Mountains Habitat Linkage Planning Map," a copy of which is attached with this memo (hereinafter, "ESM Map"). A report on the ESM Map prepared by SMMC staff states it is "a comprehensive map of known and potential wildlife corridors in the eastern Santa Monica Mountains" and "covers the area between the I-405 and US-101 freeways comprehensively, with the exception of smaller peripheral habitat patches." SMMC claims the ESM Map is part of a larger effort to preserve "the habitat linkage or wildlife corridor system that provides for animal movement" in the Zone, along with conservation easements, deed restrictions, and no fencing conditions.

The SMMC staff report states that the ESM Map is "not definitive in all areas"; "consists of outlined habitat blocks and lines depicting both know[n], and potentially functional, wildlife corridors"; and that portions of the map were not "ground-truthed." It also states that "[t]he map delineations are based on the best available Google Earth aerial and street view photography combined with accumulated staff knowledge."

In May 2017, SMMC sent a copy of the ESM Map to the DCP, stating in an attached letter that the map "is an official resource tool for both government and public use to understand, assess, and protect habitat and wildlife corridors. SMMC is the principal State planning agency in the … Zone." The letter requests that DCP "distribute the map widely and incorporate the information into the City's environmental review and planning processes without delay."

In December 2017, SMMC adopted a second map entitled "Griffith Park Area Habitat Linkage Planning Map," a copy of which is attached with this memo (hereinafter "GP Map", or collectively with the ESM Map, "the SMMC Maps"). The GP Map purports to expand the January 2017 wildlife corridor map to the area around Interstate 5 "at the eastern edge of Griffith Park and into the Los Angeles River." The staff report associated with the GP Map claims DCP staff "requested this expansion of the mapping." Like the January 2017 map, SMMC states that portions of the December 2017 map were not ground-truthed and that the map as a whole is based on Google Earth photography plus "accumulated staff knowledge."

Under CEQA, "[u]nsubstantiated opinion, even expert opinion, is not substantial evidence for a fair argument" (*Taxpayers for Accountable School Bond Spending v. San Diego School District* (2013) 215 Cal.App.4th 1013, 1036). "[I]nterpretation of technical or scientific information requires an expert evaluation. Testimony by members of the public on such issues does not qualify as substantial evidence. … [I]n the absence of a specific factual foundation in the record, dire predictions by nonexperts regarding the consequences of a project do not constitute substantial evidence" (*Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1417).

While SMMC is a State agency, not a "member of the public," its maps – which deal with technical and scientific issues regarding the movements of wildlife through the Zone – do not appear to be based on the substantiated expert opinion necessary for them to qualify as substantial evidence. First, SMMC provides no evidence that the maps were created by a licensed biologist or other wildlife expert, nor does it even identify which individual SMMC staff members created the map. SMMC's 2016-2017 Annual Report to the Legislature lists its Board and Advisory Committee members, some of whom may have expertise in wildlife or biology issues, but there is no indication that any of them were involved in preparation of the maps.[26]

Second, the SMMC staff reports associated with the two maps state they are only based on "Google Earth aerial and street view photography combined with accumulated staff knowledge." SMMC's May 2017 letter to DCP further states that the original map "was compiled using all publically [*sic*] available digital aerial photography and ground truthing where public access was permissible." Johanna Page, a biologist at Dudek, Inc. told the City Planning Department in conversations after the maps were released in 2017, the maps were useful to highlight potential wildlife corridors she believes they cannot be relied on as definitive evidence of such corridors without a formal biological survey and complete ground-truthing of the map areas.[27]

Third, unlike the SMMC maps, other available California wildlife corridor maps were prepared in collaboration with a wide variety of government agencies and non-profits with clear expertise in biological issues. For example, in February 2010 as part of their "California Essential Habitat Connectivity Project," the California Department of Fish and Wildlife (CDFW) and Los Angeles Department of Transportation (LADOT) "commissioned a team of consultants to produce a statewide assessment of essential habitat

[26] SMMC's 2016-2017 Annual Report is available at http://www.smmc.ca.gov/2016-17_Annual%20Report.pdf.

[27] Another recent biological resources report for a different project prepared by SWCA Environmental Consultants determined that the SMMC "mapping does not infer any biological significance or confer any special protections." It further determined, after investigation of the subject property, that the property "does not provide unique or high-quality biological habitat values. There is no evidence of wildlife movement through the property. The site is in a developed residential neighborhood and is likely to be visited infrequently by wildlife typical of such neighborhoods and tolerant of human activity." A conclusion along these lines in a CE narrative is likely sufficient substantial evidence that a particular project is not subject to a Section 15300.2 exception, absent evidence of biological impacts beyond the SMMC maps.

connectivity by February of 2010, using the best available science, data sets, spatial analyses and modeling techniques."[28] This project, which produced numerous wildlife and habitat maps as well as a detailed 313-page report, was the result of collaboration between "sixty federal, state, local, tribal and non-governmental organizations" and peer reviewed by five university professors with Ph.Ds in biology.

The "California Essential Habitat Connectivity Project" was also prepared pursuant to specific legislative mandate. ABl No. 2785 (2007-2008 Reg. Sess., codified in Fish and Game Code Sections 1930, 1930.5, 1932, and 1932.5) directed CDFW to "investigate, study, and identify those areas in the state that are most essential as wildlife corridors and habitat linkages." It further directed CDFW to "[d]evelop and maintain a spatial data system to identify" wildlife corridors containing "information essential for evaluating the needs of wildlife species … including distribution and movement patterns". As part of this ongoing effort, CDFW is required to "develop and maintain the database by incorporating mapping products and data developed by other state agencies" and "[m]ake all of the data sets, and associated analytical products, available to the public and other government entities." CDFW is also required to "seek input from representatives of other state agencies, local government, federal agencies, nongovernmental conservation organizations, landowners, agriculture, recreation, scientific entities, and industry in determining essential wildlife corridors and habitat linkages. Private and public landowners shall be given a reasonable opportunity to review and comment on the wildlife characteristics of their land…."

As another example, in 2008 South Coast Wildlands, an environmental non-profit, produced a series of wildlife linkage maps and a 63-page report entitled "South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion".[29] The maps and report were prepared in collaboration with over a dozen "Project Partners," including the California Department of Parks and Recreation, the United States Forest Service, the Conservation Biology Institute, and San Diego State University. The maps and report were further based on extensive citations to biological studies and literature, and field surveys by South Coast Wildlands and its partners "to ground-truth habitat conditions, document existing barriers and potential passageways, and determine restoration opportunities."

By contrast, the SMMC Maps appear to have been produced by SMMC alone without the assistance of other agencies or individuals with clear expertise in wildlife corridor or biological issues, or input by public and private landowners whose property might be affected by the maps. As noted above, the maps also appear to be based primarily on Google Earth data, some ground-truthing (by staff-members of unknown expertise), and SMMC staff's ad hoc observations – rather than more rigorous scientific data – and SMMC provided none of this information along with its maps or in its associated staff reports. And unlike the California Essential Habitat Connectivity Project prepared by CDFW and LADOT, the SMMC Maps were not prepared pursuant to specific statutory mandate.

Based on all of the above, the City finds the SMMC Linkage Maps are not supported with Substantial Evidence.

Wildlife Pilot Study and Wildlife Corridor Ordinance

On April 22, 2016, the PLUM Committee approved a motion for DCP to prepare an ordinance to create a Wildlife Corridor in the eastern area of the Santa Monica Mountains (Hillside Ordinance Zone). The action items that were adopted by the City Council (Council File 14-0518) instructs DCP to prepare an ordinance to: 1) require project applicants to permanently accommodate wildlife habitat connectivity as part of their development project, prior to issuance of any building or grading permits, 2) require easements and deed restrictions in perpetuity to protect wildlife habitat connectivity, 3) formally designate the area as a Regional Wildlife Habitat Linkage Zone in the LAMC, and 4) require a Biological Constraints Checklist as part of

[28] The California Essential Habitat Connectivity Project report is available at https://www.wildlife.ca.gov/conservation/planning/connectivity/CEHC.

[29] The South Coast Missing Linkages report is available at http://www.scwildlands.org/reports/SCMLRegionalReport.pdf

every new building project including a habitat connectivity and wildlife permeability review within areas of concern. The action items also instruct DCP to report on the feasibility of identifying the areas within the City that are in or within 500 feet of the Rim of the Valley Corridor Special Resources Study Area as a "Potential Regional Wildlife Habitat Linkage Zone" and to provide a system of informing all applicants of building permits and planning approvals that they are within this zone and that they should make feasible accommodations for wildlife linkages. During the approval process of any subdivision of land or lot line adjustment within this zone, DCP would require that projects accommodate wildlife linkage areas by providing map design guidelines. DCP is also to report on the feasibility of incorporating these maps and critical wildlife linkage areas into Community Plan updates.

During the preparation of this EIR, the ordinance and the Regional Wildlife Habitat Linkage Zone anticipated under Council File 14-0518 had not yet been released or adopted by the City and, thus, are not mentioned in the EIR. At the time of the publication of the Final EIR for the Hollywood Community Plan Update in 2021, DCP is currently in the process of creating wildlife protection areas and regulations in the eastern area of the Santa Monica Mountains. The approved PLUM action items are part of the process that DCP is undertaking to create Protection Areas for Wildlife (PAWS). DCP is preparing regulations that could be adapted in the future Protection Areas for Wildlife. In November 2018, DCP held a public open house to provide an overview of the work program and introduced concept regulations, including fencing, landscaping, and lighting. The proposed concepts and other regulation options are currently undergoing additional study and review. A draft ordinance was released in May 2021, as of publication of this Final EIR it has yet to be considered by the City Council. If and when the wildlife protection ordinance is adopted by the City, development within the Plan Area would be required to comply with the regulations.

Although the Wildlife Pilot Study has shared maps of wetlands, streams, and riparian habitat areas, the information is preliminary based on limited available data and is subject to change. The pilot study has not yet identified any sensitive species. For this reason, the general biological resources information that is provided in the pilot study was not incorporated into the EIR.

Although the commenter indicates that the EIR should require DCP to complete development of the ordinance directed by City Council and include the City Council/PLUM-approved action items as mitigation measures, the ordinance as discussed previously is a separate project from the Proposed Plan and encompasses the Santa Monica Mountains that are within and outside of the Plan Area. If the action items were included as mitigation measures for the Proposed Plan, the action items would only be applicable to the Santa Monica Mountains portion of the Plan Area, and the items would not serve the City Council/PLUM's intent of implementing the action items to a broader area (i.e., all portions of the Santa Monica Mountains that are required to comply with the City's Baseline Hillside Ordinance within and outside of the Plan Area). Moreover, the City finds such a mitigation measure is infeasible as an inefficient use of City resources and that it is not desirable to wait to approve the Plan for a larger independent policy effort.

Rim of the Valley Corridor Special Resource Study

The study area for the Rim of the Valley Corridor Special Resource Study, conducted by the National Park Service (NPS), covers approximately 650,000 acres in the southern California region and includes portions of the Santa Monica Mountains, Conejo Mountain-Las Posas Hills, Simi Hills, Santa Susana Mountains, Upper Santa Clara River, the Verdugo Mountains-San Rafael Hills, the Los Angeles River and Arroyo Seco corridors, and the San Gabriel Mountains. The Santa Monica Mountains portion of the Hollywood Community Plan Area encompasses only a small portion of the study area for the Rim of the Valley Corridor. The final study documents for the Rim of the Valley Corridor Special Resource Study, which include the Finding of No Significant Impact, Errata/Technical Corrections to the Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment, and the Draft Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment, were transmitted to Congress on February 16, 2016.

The Rim of the Valley Corridor Special Resource Study analyzes four alternatives. The selected alternative for the study would expand the boundaries of the Santa Monica Mountains National Recreation Area (SMMNRA) by approximately 170,000 acres and would include the Santa Monica Mountains portion of the Hollywood Community Plan Area. The proposed boundary addition for the Rim of the Valley Corridor Special Resource Study includes habitat types that contribute to the high biodiversity of the Santa Monica Mountains, functioning wildlife corridors, highly scenic landscapes, historic and archeological sites, geologic and paleontological resources, open space and recreation areas, and trails. The Rim of the Valley Corridor Special Resource Study determined that the selected alternative would allow NPS to provide technical assistance to surrounding local communities, agencies, and private land-owners to maintain habitat connectivity, protect key resources, and plan for new parks and trails. The boundary adjustment would provide recreational opportunities to a broad range of urban communities, including those that are underrepresented in national parks and underserved by state and local parks. Unless purchased by or donated to NPS, land within the proposed boundary addition would generally be subject to existing general plans and zonings of local jurisdictions, as well as state and local laws and policies. Where activities must cross federally-owned lands, NPS regulations may apply. The boundary adjustment would not affect private properties. The boundary adjustment proposed in the Special Resource Study would expand and enhance protection of significant resources already within SMMNRA, including connections to Griffith Park and riparian areas along the Los Angeles River. The selected alternative would also identify common priorities for land conservation that would emphasize protecting and enhancing habitat connectivity between existing parks and open spaces, contribute to restoration efforts that would enhance biodiversity and create more resilient biological systems, provide conservation and restoration efforts that collaborate with other agencies, document and protect cultural resources in the SMMNRA.

A bill to expand the boundaries of SMMNRA was introduced in October 2017. On February, 26, 2021, the Santa Monica Mountains National Recreation Area Boundary Adjustment Study Act was passed as a part of the Protecting America's Wilderness and Public Lands Act. The legislation will commission the National Park Service to conduct a three-year Special Resource Study to determine whether to add much of the Santa Monica Bay watershed to the SMMNRA or to create a new national recreation area. The Special Resource Study was not discussed in the Regulatory Framework subsection and other subsections of Section 4.4, Biological Resources as it will not be complete for a few more years.

Most of the biological resources discussion in the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* is generalized and does not specifically identify whether a specific habitat and species can be found in the Plan Area. The *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* provides a general depiction of the types of habitats, sensitive species, sensitive natural communities, wetlands, streams, riparian habitat, and wildlife corridors that are found within the Santa Monica Mountains, which extends beyond the Plan Area. The biological resources that are discussed in the document may or may not be found within the Plan Area. The document does not specifically identify the wetlands, streams, riparian habitat, and wildlife corridors that are specifically found within the Plan Area.

While the biological resources discussion in the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* is generalized, the document highlights a few wildlife habitats and sensitive species within the Hollywood Community Plan Area, such as federally-listed threatened and endangered species, and the plant species found within Griffith Park. Overall, the discussion of wildlife habitat, sensitive species, and wildlife corridor in this EIR is consistent with the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment*. Figure 2.6 of the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* identifies the least Bell's vireo, Nevin's barberry, and Braunton's milk-vetch as federally-listed threatened and endangered species that have been found in the Hollywood Community Plan Project Area. These three species are identified in the EIR, and the potential for the Proposed Plan to significantly affect each of these three threatened or endangered species are discussed in detailed in Impact 4.4-1. The *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* uses CNDDB to identify the occurrence of the threatened and endangered species found in the

study area, which is the same database that the EIR for the Proposed Plan uses to identify sensitive species that has documented to occur within the Plan Area. The Rim of the Valley Corridor Special Resource Study identifies several plant species that were not identified in the EIR. See **Chapter 4.0, Corrections & Additions** for page 4.4-7, for revisions to the discussion of vegetation specifically found within Griffith Park, as identified in the study. None of these plant species have been classified as threatened or endangered, and these revisions do not affect the conclusions of the EIR.

In regards to wildlife habitat, page 10 of the *Rim of the Valley Corridor Draft Special Resource Study and Environmental Assessment* states that "open space areas have become increasingly fragmented and isolated resulting in threats in the viability of native plant and animal populations including rare, threatened, and endangered species, and rare or unusual plant communities and habitat." The document further states that "movement through contiguous habitat is essential to wildlife survival, whether it be the day-to-day movements of individuals seeking food, shelter, or mates, dispersal of offspring to find new homes, or seasonal migration to find favorable conditions. Movement is also essential for gene flow, for recolonizing unoccupied habitat after a local population goes extinct, and for species to shift their geographic range in response to global climate change." This discussion is consistent with the discussion in the EIR.

Nichols Canyon Stream

Although Nichols Canyon is located in the Santa Monica Mountains and contains a natural stream, it is one of several natural streams and wetlands that can be found in the Santa Monica Mountains. The EIR evaluates impacts that the Proposed Plan would have on wetlands and riparian habitat in the Plan Area, not just in Nichols Canyon. The discussion under Impact 4.4-3 acknowledges that properties adjacent to riparian communities and other wetland habitats could potentially be developed during the life of the Proposed Plan. Although a few comments briefly describe the Nichols Canyon Stream and the types of wildlife that can be found in the area surrounding the stream, the comments do not provide the source of the information, and the information is not inconsistent with the programmatic analysis presented in the EIR. None of the species that are identified in the comments are candidate, sensitive, or special status species. Additionally, Nichols Canyon has not been identified as a significant ecological area, and no special status species that are presumed extant has been identified in the area.

The Proposed Plan does not propose any changes that would promote or cause growth in the hillsides, which includes all areas of the Santa Monica Mountains within the Plan Area and the area surrounding Nichols Canyon Stream (see **Master Response No. 9**). The Proposed Plan would generally maintain the existing zoning in the hillsides, which are predominately low-density single-family residential and open space, but would further limit density on single-family lots with steep slopes. The Proposed Plan does not add any new housing development capacity to the hillsides. Any development that occurs within the hillsides during the life of the Proposed Plan would be required to comply with the zoning and land use designation of the specific property, most of which are designated for open space or single-family residential uses. Properties may also be required to comply with the City's Baseline Hillside Ordinance and if applicable, the Hillside Construction Regulation (HCR) Ordinance, which established new regulations to address construction related impacts of single-family residential development in the hillside areas, including a Site Plan Review discretionary process for single-family houses 17,500 square feet or larger. The Proposed Plan is expanding the HCR area in the hillside communities of Hollywood to include additional areas on both sides of the US-101 Freeway. Discretionary projects in or within 200 feet of Griffith Park are required to comply with the City's Baseline Hillside Ordinance, which includes the Santa Monica Mountains, and would be required to comply with Mitigation Measures **BR-1**, **BR-2**, and **BR-6**. Mitigation Measures **BR-1** and **BR-2** would ensure that any potential sensitive species in Nichols Canyon is identified and protected if a discretionary project is proposed in the area. These mitigation measures would require applicants to conduct a biological resources assessment to identify the presence or absence of sensitive species, determine the individual project's impact on the sensitive species, and implement measures to protect sensitive species and to maintain wildlife corridors.

Discretionary projects located on sites with jurisdictional waters, wetlands, seasonal or perennial streams, and/or riparian habitat would be required to comply with Mitigation Measures **BR-3** through **BR-5**. A qualified biologist would determine whether sites with streams including Nichols Canyon Stream contains jurisdictional resources. Additionally, the mitigation measures would require individual projects to be designed and/or sited to avoid disturbance to or loss of jurisdictional resources. The mitigation measures would ensure that any potential wetlands that could be found in Nichols Canyon, as with all other portions of the Plan Area (including the Santa Monica Mountains east and west of US-101, the foothills, and flatlands), are identified and protected if any discretionary projects are proposed in the area during the lifetime of the Proposed Plan. If jurisdictional waters and riparian habitat cannot be avoided, appropriate permits would be required and applicants would be required to contribute to a mitigation bank, contribute to an in-lieu fee program, establish on-site or off-site restoration of in-kind habitat, or establish on-site or off-site restoration of out-of-kind habitat that is of high value to the watershed and provides important watershed functions. Applicants would also be required to prepare a compensatory plan. Additionally, all projects, including those in Nichols Canyon would be required to comply with the California Fish and Game Code sections that protect birds, their eggs and nests, including Sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird, except English sparrows), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take or possession of any migratory nongame bird). The City recognizes that while the mitigation measures would apply to discretionary projects located on sites with jurisdictional waters, wetlands, seasonal or perennial streams, and/or riparian habitat, it would be unjustified, difficult, and require an inordinate amount of staff time and resources to capture the small number of discretionary projects in other portions of the Plan Area, as well as ministerial projects, that could have significant impacts on jurisdictional waters, wetlands, seasonal or perennial streams, and/or riparian habitat. For this reason, the EIR concluded that the Proposed Plan would have a significant and unavoidable impact after implementation of mitigation measures.

Conclusion

The EIR evaluates impacts of the Proposed Plan on biological resources for the entire Project Area, including the Santa Monica Mountains east and west of US-101, Griffith Park SEA, Hollywood Hills, Los Angeles River, foothills, and flatlands within the Plan Area. The EIR addresses wildlife, habitat, and the potential for sensitive species to be found in the Santa Monica Mountains to the east and west of US-101. Additionally, the mitigation measures in the EIR apply to areas within the Plan Area that are likely to contain biological resources, such as in the hillside areas that are required to comply with the City's Baseline Hillside Ordinance (which includes the Hollywood Hills and Santa Monica Mountains to the west of US-101), and areas that has the potential to have jurisdictional waters, riparian habitat, streams, wetlands, and/or other water bodies. The discussion within the Wildlife Pilot Study and Rim of the Valley Corridor Special Resources Study were not included in the EIR because the studies have not been finalized and/or the discussions of biological resources are not specific to the Plan Area and/or the discussions are consistent with the analysis already contained in the EIR. While Nichols Canyon contains a stream, it is one of many streams that can be found in the Santa Monica Mountains. The discussion of streams and wetlands in the EIR applies to all streams and wetlands in the Santa Monica Mountains portion of the Plan Area.

The comments provide no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

MASTER RESPONSE NO. 8 – TRANSPORTATION & TRAFFIC

Summary of Master Response

- **The purpose of this master response is to provide additional context as to why vehicular congestion impacts can no longer be mitigated in urban areas, such as Hollywood, to address vehicle congestion unrelated to other impacts, and how this led to the State's adoption of new CEQA Guidelines in 2019 to comply with Senate Bill (SB) 743.**
- **In response, the City of Los Angeles adopted new transportation impact thresholds and updated CEQA guidance for transportation studies in 2019, and subsequently recirculated Section 4.15 Transportation and Traffic of the Proposed Plan's EIR in the fall of 2019 to reflect the impacts of the Proposed Plan under the current City significance criteria.**
- **Under the current significance criteria, Total VMT per service population, the metric in effect for transportation impact analysis, would decrease with the Proposed Plan, no significant impact to VMT would occur, and no mitigation measures would be required. Total VMT is defined as all trip activity, which includes household trips, work trips, retail trips, etc.**
- **The previously identified impacts to the vehicular circulation system discussed in the Transportation and Traffic section of the EIR published in 2018 are no longer relevant; however, traffic congestion is still considered as potential secondary impacts such as to noise or safety.**
- **Traffic congestion was analyzed as it relates to emergency access under the Transportation thresholds.**
- **This response also addresses comments regarding tourism, visitors, and special events in Hollywood related to traffic operations, congestion, and vehicle miles traveled (VMT).**
- **The response below clarifies the EIR analysis and addresses the concerns of commenters; it bolsters and/or clarifies the impact analysis in Section 4.15 of the RDEIR, and does not constitute significant new information or change the impact conclusions of the recirculated Transportation and Traffic section in 2019.**

Summary of Comments

Concerns about traffic congestion in the Hollywood Community Plan Area were stated in various comment letters received for Section 4.15, Transportation and Traffic, of the EIR released in 2018. Several comments on the 2018 Transportation and Traffic section mentioned that mitigation measures to reduce significant impacts seemed to be lacking. In 2019, the Transportation and Traffic section was updated and recirculated to comply with the State's new CEQA Guidelines for transportation impacts in response to SB 743. The recirculated Section 4.15, Transportation and Traffic, concluded that there are no significant impacts and therefore mitigation measures are not required. The previously identified impacts discussed in the 2018 Transportation and Traffic section are no longer relevant. Individual responses to the comments received on the 2018 publication have been provided based on the information contained in the 2019 recirculated section. This master response provides additional context to clarify why vehicular circulation impacts can no longer be mitigated in urban areas, such as Hollywood, and how this has led to the adoption of new CEQA Guidelines by the Natural Resources Agency in early 2019 to comply with SB 743 (Steinberg, 2013) and ultimately led to the adoption of new transportation impact thresholds for the City of Los Angeles. VMT is a factor of the number and distance of trips to and from a designated site and includes all trip activity such as household trips, work trips, retail trips, etc. VMT measures whether projects contribute to goals such as reducing greenhouse gas emissions, supporting multimodal transportation options, and promoting diverse land uses and infill development.

In addition to congestion, the impacts of special events on traffic operations were mentioned in several comment letters received for both the 2018 and the 2019 Traffic and Transportation sections. Comments state that the traffic data is outdated because it was only collected on a Tuesday, Wednesday and Thursday,

which does not reflect traffic conditions when street closures are most likely to occur for special events, and that special events in Hollywood occur on a frequent basis. Comments also state that the discussion of special events does not include a full picture of all activities, such as performances at the John Anson Ford Theatres, off-season events at the Hollywood Bowl, and filming. The majority of these comments were received prior to the recirculated Section 4.15, and the descriptions of special events have since been updated. However, a few new comments were received on the recirculated Section 4.15, stating that film-related events should pertain to actual filming and not activities associated with filming such as movie premieres. The comments further state that concurrent special events and tourism are not reflected in the transportation analysis.

Response

Evolving Urban and Legal Context

Los Angeles, like all urban environments, is in a constant state of gradual evolution. As population grows, as the built environment changes, and as technology advances, the City must find new ways to achieve its many goals, including its goal of improving mobility. Historically, roadway capacity enhancement projects have been used to mitigate congestion and improve level of service (LOS). LOS was the commonly used metric in CEQA analysis until VMT was recently approved; see page 4.15-14 of the recirculated Section 4.15 for more information on LOS. However, in urban areas like Hollywood, roadway capacity improvements would require acquisition of right-of-way, including the demolition of buildings on parcels adjacent to existing roadways that would physically alter the makeup of communities. Additionally, research has shown that adding roadway capacity does not reduce congestion, but rather induces more vehicle travel as well as GHG emissions associated with that additional vehicle travel[30]. In addition to the constraints of the built environment, recent legislation, such as SB 375 and SB 743, has shaped the types of transportation improvements being considered by the City.

SB 375

California SB 375 was enacted to reduce greenhouse gas (GHG) emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, the City must conform to a Sustainable Communities Strategy (SCS) that provides a plan for meeting emissions reduction targets set forth by the California Air Resources Board. This requires transportation plans and their associated fee programs to consider non-vehicular modes of travel, such as transit, biking and walking and the infrastructure needed to make these modes a viable option for those that live and work in the community.

SB 743

Since the publication of the Proposed Plan's EIR in November 2018, the Natural Resources Agency certified new guidelines for transportation impacts. The CEQA Guidelines were updated in response to SB 743 which directed the Office of Planning and Research (OPR) to establish criteria for determining the significance of transportation impacts by a metric other than LOS or similar measures of vehicular capacity or traffic congestion.[31] In response to SB 743 and the new CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, the City of Los Angeles adopted new transportation thresholds for CEQA in July 2019.[32] PRC Section 21099(b)(2) provides that upon certification of the guidelines for VMT by the Natural Resources Agency, "automobile delay, as described solely by level of service or similar

[30] National Center for Sustainable Transportation Policy Brief. Department of Environmental Science and Policy, University of California, Davis. Handy, Susan. 2015, October. *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion.* Available: http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf. Accessed on: May 24, 2016.

[31] SB 743, 2013-2014 CA State Cong. § 386 (2013)

[32] City of Los Angeles California Environmental Quality Act (CEQA) Transportation Thresholds, 2019.

measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment pursuant to this division. …"

SB 743 changes the way cities measure project impacts by encouraging projects to reduce their GHG emissions through measuring VMT versus the historical priority of reducing vehicle delay at intersections (LOS) through roadway widening as a mitigation. The State as a whole, including the City, updated their CEQA Guidelines with respect to the focus of transportation planning and traffic impact analysis. The previous significance thresholds for traffic operations impacts based on LOS are no longer relevant. Instead, as directed by SB 743, the State, including the City, has moved to a VMT focus, with the objective being to reduce VMT (and therefore GHG) as appropriate. More details about VMT metrics are provided below (see VMT Metrics for Proposed Plan).

Proposed Plan

The transportation improvements identified in the Proposed Plan are consistent with the City's Mobility Plan 2035 and were developed to improve the circulation system as measured by VMT, rather than LOS. As described by the Office of Planning and Research, possible mitigations for VMT include improving or increasing access to transit, improving pedestrian or bicycle networks, providing traffic calming, providing bicycle parking, providing car-sharing, bike sharing, and ride sharing programs, and parking demand management programs. The Proposed Plan's preliminary list of representative transportation improvement types are not exhaustive and include transit enhancements, active transportation projects, transportation demand management programs, and roadway and Intelligent Transportation System (ITS) projects; these improvements are intended to mitigate VMT.

Recirculated Section 4.15, Transportation and Traffic

Section 4.15, Transportation and Traffic, was updated to reflect the new CEQA Guidelines and the City's adopted transportation thresholds. The mobility network contained in the Proposed Plan has not changed since the publication of the EIR in 2018. However, the RDEIR section has been updated to reflect VMT as the primary metric for transportation impacts and the impact conclusions and mitigation measures have been updated accordingly. The RDEIR supersedes Section 4.15 impact section in the Draft EIR, for this EIR. Under the Guidelines, the City is not required to respond to an impact section that has been superceded by a recirculated impact section.

In addition to considering the primary impacts of the Proposed Plan, CEQA also requires that any secondary impacts resulting from the Proposed Plan also be considered with regard to public safety. The potential secondary impacts of congestion have been included in Section 4.15 of the RDEIR. Specifically, the discussion of emergency access under Impact 4.15-4 has been updated on pages 4.15-45 to 4.15-60 to reflect the potential secondary impacts resulting from increased congestion in the Plan Area due to additional development and regional background growth.

VMT Metrics for Proposed Plan

VMT is a measure of the number of miles being driven within a defined area and is based on the number of Vehicle Trips (VT) multiplied by the average trip lengths (in miles) for various trip types. The vehicle-trip generation estimated by the Travel Demand Forecasting (TDF) model was categorized according to the origin and destination of each trip. Internal-to-internal (II) trips remain within the Plan Area. Internal-to-external (IX) trips originate within the Plan Area and terminate at an outside destination. External-to-internal (XI) trips originate outside the Plan Area and terminate within it. The VMT calculation accounts for all internal (II) trips and trips that begin or end (IX and XI) within the Plan Area, as these trips are generated by or attracted to land uses within the Hollywood CPA.

The Office of Planning and Research recommends that a per capita or per employee VMT that is 15 percent below that of existing development regionally may be a reasonable threshold. The use of per capita VMT and per employee VMT only represent the household generated VMT (per capita) and commute generated VMT (per employee) for those who live and work in the Plan Area and does not reflect all travel in the area. Therefore, the EIR analyzes VMT as Total Daily VMT per Service Population, which equates to all VMT for the Plan Area divided by the number of people living and working within the Plan Area. All VMT accounts for all internal trips, and trips that begin or end within the Plan Area. VMT per service population showcases the effects of all vehicular movement in an area. It includes not only trips that are attracted and produced by home and work trips, but those that fit in neither category (i.e. school to grocery store, or visitors) as well as truck trips. It is therefore more representative of the effect of users and trips on the roadways in the Plan Area when compared to household or employment generated VMT metrics.

The travel behavior effects of land use changes in Hollywood can be understood by measuring the VMT per Service Population for the Plan Area in the year 2040 and comparing it to the VMT per Service Population for the Plan Area's 2016 Baseline and the 2016 SCAG Region. This comparison shows how future expected VMT per Service Population under the Proposed Plan compares with the baseline VMT per Service Population for the Plan Area and for the greater SCAG Region. As discussed on page 4.15-40 of RDEIR Section 4.15, the Proposed Plan would have an impact if the Plan's VMT exceeds either of the following:

1. The Plan results in average VMT per service population for the 2040 Proposed Plan that exceeds 15 percent below the regional average total VMT per service population from 2016 SCAG Region.
2. The Plan results in average total VMT per service population for the 2040 Proposed Plan that exceeds the average total VMT per service population for the Proposed Plan Area from 2016 Baseline.

In 2040, the average Total Daily VMT per service population in the Hollywood CPA is 15.2 and SCAG's metric for the year 2016 is 35.4. As stated on Table 4.15-9 on page 4.15-40, the Total Daily VMT per service population generated by the Plan Area in 2040 is 57 percent lower, and the impact is less than significant.

The Total VMT per service population generated by the Plan Area is 17 percent lower than the 2016 Baseline. On average, the Total VMT per service population in 2040 is 15.2 and the Total VMT per service population in 2016 is 18.3. Given that the 2040 Proposed Plan's average Total VMT per service population is less than the average Total VMT per service population for the Plan Area's 2016 Baseline, the impact of the Proposed Plan related to the second VMT threshold is also less than significant. As concluded in the EIR, the Proposed Plan has a less than significant impact with regard to the VMT thresholds in the CEQA Guidelines.

Congestion and Safety

In addition to the VMT methodology, the Proposed Plan was also analyzed using LOS changes on road segments. Although LOS as a metric for traffic congestion is not used to determine significant impacts for CEQA, the impact of traffic congestion on access for safety and emergency access was maintained. A separate master response on Emergency Services is available; please see **Master Response No. 5**. As discussed in Impact 4.15-4, the impact analysis was updated to respond to comments made on the EIR released in 2018 related to the associated emergency access impacts from the Proposed Plan's impacts to roadway congestion.

Impact 4.15-4 considered the Proposed Plan's impacts to roadway congestion using LOS and volume-to-capacity (V/C) criteria when compared to existing conditions (2016) and then discussed the emergency access impacts associated with roadway congestion. On a regional level, traffic in the Project Area is anticipated to increase in conjunction with regional population, housing, and employment growth projected to occur in the future by SCAG. This growth will occur with or without implementation of the Proposed Plan. The background growth influences the transportation analysis by accounting for the increased activity levels under Proposed Plan conditions, although those increases would occur with or without the Plan. Background growth is included in the Hollywood Model, which is built from the City of Los Angeles Model

as described in the Model Development Report included in Appendix J. With the implementation of the Proposed Plan and regional growth anticipated in Year 2040, the weighted V/C ratio continues to worsen under LOS E operation during the AM peak hour (Table 4.15-11) and LOS F operation during the PM peak hour (Table 4.15-12).

Similar to LOS, neighborhood traffic intrusion was also previously used to determine whether a proposed community land use and transportation network plan resulted in transportation related impacts. Though no longer used as a CEQA threshold, a discussion was included for informational purposes. Neighborhood traffic intrusion can be caused by traffic generated by the Proposed Plan, and/or traffic diverted or shifted due to the Proposed Plan onto local streets in residential neighborhoods. Under Future With Project Conditions, the share of roadway street segments projected to operate at LOS E or F exceeds the share for the Existing conditions in the AM and PM peak periods. Although some of this increase is offset by a reduction in vehicular traffic due to shifts to other modes and routes, congestion could increase on certain roadways in the Project Area. In addition, some drivers may divert from the major corridors in the Project Area to parallel routes.

The Proposed Plan and Project List includes programs and policies to address neighborhood traffic intrusion. Future developments need to complete the required Traffic Study and Traffic Impact procedures as described in LADOT's *Transportation Assessment Guidelines*. Per these guidelines released in July 2020, a contribution to a traffic calming program or the development of a Neighborhood Traffic Management (NTM) Plan, may be required for future development projects.

Special Events and Transportation Analysis

Special events in Hollywood frequently require partial or full closure of Hollywood Boulevard and other roadways in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time, as stated on page 4.15-46 of the EIR. To the extent that special event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) between the months of February and May, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area under Existing Conditions. This same level of special event traffic is also accounted for in the traffic forecasts and analysis of Year 2040 conditions. The Proposed Plan would not change the number or frequency of special events within the Plan Area under future Year 2040 conditions. While increased congestion from the Proposed Plan may exacerbate existing traffic conditions during special events, congestion in and of itself is not a significant impact as discussed above. As discussed in the EIR, to extent that special events adds to traffic congestion that results in inadequate emergency response, that could be a CEQA impact. However, as discussed in the EIR and **Master Response No. 5**, LAFD and LAPD plan for existing and forecasted conditions and constantly monitor real world conditions and circumstances that affect demands on police, fire and emergency response services, including existing residents, users, visitors, and guests to the Plan Area, and including how tourists and special events create unique risks, such as terrorism, etc. Based on that monitoring, LAFD and LAPD adjust their resources and plan for new facilities based on those demands. To the extent the traffic from the Proposed Plan affects emergency response times, it is reasonably anticipated that LAFD and LAPD will take the necessary actions to address those needs to ensure adequate response times are maintained.

Regarding the comments that the discussion of special events does not include a complete picture of all activities, such as performances at the John Anson Ford Theatres, off-season events at the Hollywood Bowl, and filming, these comments were received prior to the recirculated Section 4.15, Transportation and Traffic. The updated description of special events is included on pages 4.15-24 and 4.15-25. However, new comments were received stating that film-related events should pertain to actual filming and not activities associated with filming such as movie premieres. As explained on page 4.15-24, the description of special events is intended to provide an overview of the various activities that occur in Hollywood to illustrate the robust level of activity and events in the area and is not meant to be an exhaustive list of all current or potential future events. Many different types of events are described in the EIR that require partial or full

closure of city streets, including sidewalks and crosswalks, for periods of several hours to several days at a time. The expanded definition of filming and film-related events does not change the analysis or impacts findings in Section 4.15. Commenters did not provide any substantial evidence as to why an expanded definition of film-related events would change the conclusions in the EIR.

As explained in Section 4.15 on page 4.15-11, the data collection effort for the Existing Conditions assessment included traffic counts recorded by the Regional Integration of ITS Project (RIITS) during the months of February, March, April and May on a Tuesday, Wednesday and Thursday in 2016. Consequently, the count data utilized in the EIR represents a much more robust dataset than the traditional approach of collecting vehicle counts on a single day. As explained in Appendix J, the Hollywood Model validation consisted of 284 one-directional arterial segments and 20 one-directional freeway segments. In addition, four screenlines were selected to validate the traffic volumes within the Plan Area to ensure that the total number of vehicles traveling across the model area is consistent with the observed volumes. As shown in Table 4 of Appendix J, the Hollywood Model meets or exceeds all validation criteria for the three time periods observed and forecasted (daily, AM peak, and PM peak).

Regarding the comments stating that the transportation analysis incorrectly states that special events are accounted for in the weekday analysis, the statement in the EIR is correct. Specifically, the EIR on page 4.25-46 says that to the extent that event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) during peak travel hours between the months of February and May, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area under existing conditions, and this same level of special event traffic is also accounted for in the traffic forecasts and analysis of Year 2040 conditions. As stated in the EIR on page 4.15-14, the typical weekday peak hours includes the period when schools are in session. These peak hours represent the highest level of travel demand during typical conditions across the entire Plan Area. While special events do generate additional travel during other periods such as Friday evenings, these periods are more likely to be influenced by holidays (e.g., a three-day weekend in which work and/or schools are not in session), or work schedules that do not include presence in the office on Fridays. Likewise, travel demand on weekends does not include the influence of schools and many jobs, and overall traffic demand is likely to be lower and more distributed across the day. Therefore, analyzing traffic impacts during the weekdays when the additional impact of new development will be greatest was found to be the most applicable analysis for the Proposed Plan. As discussed above, the VMT analysis reflects all travel.

The Proposed Plan will not result in any new special event activities or additional roadway closures. Congestion is not in and of itself a significant impact. See **Master Response No/ 5** for discussion of impacts from the Proposed Project as it relates to emergency access and response times. Commenters have provided argument and speculation, but no substantial evidence that the Proposed Project will result in an impact to safety based on congestion during special events, neighborhood intrusion, or any other circumstance or event during the plan horizon. As discussed in **Master Response No. 5** and the Recirculated Draft EIR Section 4.15, the LAPD, LAFD and other City departments, including LADOT, plan for disasters and for increased traffic congestion.

Conclusion

The transportation analysis based on the City's current significance criteria shows that Total VMT per service population will decrease with the Proposed Plan and concludes less than significant impacts. The analysis of Total Daily VMT per Service Population captures the VMT generated by residents, employees, and visitors in the Plan Area and reflects their travel within Hollywood as well as travel between Hollywood and their ultimate origin/destination, and then is divided by the number of people living and working within the Plan Area. Although LOS and congestion can still be considered as secondary impacts in the context of emergency access, LOS is no longer a CEQA impact threshold, and therefore, mitigation measures for LOS are no longer required. The transportation improvements identified in the Proposed Plan are consistent with

the City's Mobility Plan 2035 and were developed to improve the circulation system as measured by VMT, rather than LOS. Although numerous comments were received regarding transportation in the Plan Area, the comments did not provide any substantial evidence that would change the transportation analysis or impact conclusions in the EIR.

MASTER RESPONSE NO. 9 – HILLSIDES

Summary of Master Response

- **The Proposed Plan will not cause growth or development in the hillsides and, thus, would not cause any significant impacts in the hillsides, including through exacerbating existing challenges in the hillsides (e.g., deteriorating infrastructure) including impacts to aesthetics, biology, hazards, public utilities, public services, wildfire risks, and deteriorating infrastructure.**
  - **There are no land use or zoning increases proposed for the Hollywood hillsides that would increase development or encourage growth under the Proposed Plan. Proposed changes in the hillsides will re-designate land from single-family residential use to Open Space to reflect existing park and open space preservation uses.**
  - **The Proposed Plan includes goals, policies, and programs to protect hillside neighborhoods (including scale, density, visual character, and emergency access), open space, and wildlife.**
  - **The Proposed Plan includes expansion of the Hillside Construction Regulation (HCR) District which will foreseeably reduce construction-related impacts from single-family residential development in neighborhoods.**
- **The Proposed Plan accommodates all growth in the Plan Area away from the hillsides, as well as low density residential neighborhoods, and open space, consistent with the Framework Element growth vision. Future residential hillside development as allowed by the existing zoning will continue to be subject to regulations, including the Baseline Hillside Mansionization Ordinance, the Oaks of Los Feliz Development Limitations, the Mulholland Scenic Parkway and Hollywoodland Specific Plans, the Single-Family Residential Zone Regulations adopted in 2017, and updated building codes including the Los Angeles Fire Code. These regulations provide for increased fire protection compared to the past.**
- **Other hillside-related draft ordinances currently in progress under two separate work programs would protect ridgelines and wildlife in portions of the Hollywood CPA. Any adopted regulations in the future will also apply to new projects, including stricter fire-defense building codes.**
- **Studies show that the relationship between population densities, fire ignitions and areas burned are not correlated. Property loss has been due to three factors: 1) the speed of the initial fire, 2) extreme climatic conditions, and 3) lack of integrated structural resistance to fire.**

Summary of Comments

Commenters described a variety of existing issues and concerns in the Hollywood hillside neighborhoods, including traffic, construction impacts, public services, fire hazards, infrastructure, aesthetics, noise and open space/wildlife preservation. Comments were received from individual stakeholders and groups representing stakeholders and residents, including neighborhood councils and homeowner associations. Commenters generally stated that these existing challenges would be exacerbated with the implementation of the Proposed Plan, that growth and additional development would increase wildfire risks, further deteriorate infrastructure, including substandard streets and aging pipes, impede access of emergency vehicles, negatively affect the visual character or scale, and cause more noise. Some commenters also discussed the ecological and natural resources found in the hillsides and the beauty of open space and expressed the desire for the Proposed Plan and the City to do more to preserve open space and protect wildlife. A few commenters stated that tourists and visitors are disturbing their quality of life and increasing fears about their ability to evacuate in the event of a wildfire because the visitors' vehicles would crowd the existing narrow streets and limit ingress and

egress, such as during the Hollywood Bowl season or when people visit the Hollywood sign and travel through the Hollywoodland neighborhood.

Response

Introduction

As discussed herein, the EIR impact conclusions that housing development in the hillside will not result in significant impacts to wildfire and impacts related to exacerbating existing deficient infrastructure is supported with substantial evidence.

Moreover, there is nothing about the Proposed Plan that will foreseeably cause impacts in the hillsides related to development in the hillsides. The Proposed Plan is a plan to accommodate growth consistent with the Framework Element and SCS policies. As discussed in Section 3.8, Project Description, in the Draft EIR at pages 3-18 to 3-22 and Figures 3-6A to 3-6G, the Proposed Plan does not propose to accommodate any of the growth in the City or Plan Area in the hillsides. While development may occur in the hillsides, it will occur based on existing zoning and planned areas of the Plan that are not being amended by the Proposed Plan.

The only zone amendments proposed in the hillsides in the Proposed Plan are rezoning or redesignating land from single-family residential use to Open Space to reflect existing park and open space preservation uses. Additionally, the Proposed Plan proposes to expand the Hillside Construction regulations that would reduce impacts from construction of housing development that would occur without the Proposed Plan. While the EIR analyzed existing conditions compared to future conditions as required by CEQA and therefore, identified future impacts from development in the hillsides in the Plan Area, the Proposed Plan will not cause that changed future condition. Therefore, in addition to all of the reasons stated in the EIR, the Master Responses, and elsewhere in the Final, there is no evidentiary basis including from the comments on the Draft EIR or Recirculated Draft EIR to find that the hillside developments will result in impacts related to wildfire or public utilities, or any other impact area.

Existing Regulations Protecting Hillsides

New development in the Project Area, including those in the Hollywood hillsides, will be subject to existing regulations for noise, visual character and scale of hillside areas, biological resources, and wildfire risks. These regulations are implemented through multiple departments and agencies, at the local, state, and federal levels, as applicable, including land use and zoning ordinances, building codes, fire codes, the Migratory Bird Treaty Act, the California Endangered Species Act, and the City's protected trees ordinance, for example. See Section 4.4, Biological Resources, of the EIR for a summary of the applicable biological resources regulations, and Section 4.12, Noise, of the EIR for a summary of the applicable noise regulations.

The Baseline Hillside Mansionization Ordinance, the Oaks of Los Feliz Development Limitations, Mulholland Scenic Parkway and Hollywoodland Specific Plans, and updated 2017 single-family R1 regulations limit the scale of new single-family residential development in the hillsides and the amount of grading that can occur on hillside lots, which helps retain the natural terrain, ridgelines, and visual character of residential neighborhoods in the hillsides. The Mulholland Scenic Parkway and Hollywoodland Specific Plans include regulations that preserve the specific plan areas' scenic features, views, visual character, and biological resources. The single-family residential hillside regulations that were updated in 2017 limit the time of day when trucks can haul earth to and from a site (Monday through Friday between 9:00 a.m. to 3:00 p.m.), and set new maximum grading quantity limits, help address concerns regarding grading, construction, noise and traffic impacts.

The City requires Site Plan Review, a discretionary entitlement, for certain development projects, including large single-family residential development that is proposed in the HCR District. Development projects that are required to undergo Site Plan Review are required to meet findings regarding building compatibility,

including height, bulk, and setbacks, with existing and future development on adjacent and neighboring properties and specific conditions may be imposed on individual development projects for approval.

The HCR District (LAMC Section 13.20) imposes restrictive grading limits and hauling operation standards for residential development projects in the HCR District. Regulations for the HCR District limit the total amount of grading and total amount of import and export of earth that could occur on a development site by right. The limits for residential zones are provided in Table 12.21.C.10-6 of the LAMC. In addition to the by-right limits for residential zone, the HCR District also limits the grading, and the import and export of earth to a maximum of 6,000 cubic yards. The HCR District imposes higher restrictions on properties that front a Substandard Hillside Limited Street.[33,34] The regulations for the HCR District also limit the size of haul trucks, the number of haul truck trips per hour, and the time of day haul trucks can travel to and from a site. The haul route for development projects in the HCR district must obtain approval from the Board of Building and Safety Commissioners for the import and/or export of 1,000 cubic yards or more of earth material. The existing HCR in the Hollywood hillsides covers the Bird Streets and Laurel Canyon neighborhoods.

The Hollywood hillsides are located in a Fire Brush Clearance Zone and Very High Fire Hazard Severity Zone (VHFHSZ), and properties in these zones are required to implement brush fire safety measures during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, comply with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements. Development in the Project Area is subject to the Los Angeles Fire Code, which is contained in Chapter V, Article 7 of the LAMC. The Los Angeles Fire Code provides regulations that safeguards life and property from fire, explosion, panic, or other hazardous conditions that may arise in the use or occupancy of buildings, structures, or premises. The Los Angeles Fire Code requires fire safe construction for all new buildings, rebuilding, and additions for structures in VHFHSZ. The building standards contained in the Los Angeles Fire Code are required by state law and are part of the California Building and Fire Codes to which all jurisdictions must adhere. Sections 57.4905 and 57.4907 of the Los Angeles Fire Code adopt the California Fire Code regulations for wildfire protection building construction and defensible space, respectively. Regulations in the Los Angeles Fire Code and California Fire Code for VHFHSZ include, but are not limited to, protecting eaves on the exposed side with ignition resistant material, constructing roofs to Class A fire resistant standards, enclosing all under-floor areas, using ignition-resistant materials for exterior doors, designing exterior vents to prevent ember intrusion, clearing flammable vegetation within 30 feet of buildings, and maintaining defensible space of at least 100 feet from each side of the structure but not beyond the property line. In addition to the Los Angeles Fire Code, the Los Angeles Building Code (LAMC Section 91.7207) also has special requirements for buildings in the VHFHSZ, such as requiring that all buildings have fire retardant roofing and prohibiting wood shakes and shingles.

Proposed Regulations for Hillsides

TheDepartment City Planning has two related work programs that will protect portions of the Hollywood hillsides in the near future: the Ridgeline Protection Ordinance (CPC-2021-3059-ZC) and the Wildlife Ordinance. The proposed Ridgeline Protection Ordinance will protect the hillsides from changes in visual character. This proposed ordinance includes portions of the Bel Air-Beverly Crest neighborhood and a part of the western hillside area in the Hollywood CPA, generally west of Laurel Canyon Boulevard. The draft ordinance was released in May 2021. This ordinance will apply development regulations including grading restrictions, structure location, and height of structures relative to ridgeline elevations to better preserve and protect the City's ridgelines.

[33] Substandard Hillside Limited Street is defined by LAMC Section 12.03 as streets that have width of less than 36 feet and are not paved to a roadway width of 28 feet, as determined by the City's Bureau of Engineering.

[34] The total quantity of import and export of earth that are permitted for properties that front a Substandard Hillside Limited Street is limited to 6,000 cubic yards and 75 percent of the amount shown in LAMC Table 12.21.C.10-6.

The Wildlife Ordinance, also released in May 2021, proposes development standards that protect wildlife. The pilot study area of the Wildlife Ordinance includes the hillsides of Hollywood west of the 101 Freeway. Please see a discussion of the Wildlife Ordinance in **Master Response No. 7 – Biological Resources**.

The proposed ordinances and any other adopted regulations in the future, including stricter fire-defense building codes, will apply to new development projects in the Project Area.

Proposed Plan Goals and Policies for Hillsides

The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the City of Los Angeles, consistent with state, regional and citywide policies aimed at reducing greenhouse gas emissions, including SB 375, SCAG's Sustainable Communities Strategy (SCS), and growth strategies provided in the General Plan Framework Element. Primary objectives include accommodating growth in selected areas of the Hollywood CPA, consistent with the City's Framework Element, including directing development opportunities and growth around existing transit systems, hubs and corridors and away from low-density residential neighborhoods, hillsides, and open space.

The Proposed Plan does not increase development potential in the hillsides. The Proposed Plan does not change the land use designation or zone of any area in the hillsides that will result in additional density, height, or floor area and does not incentivize development opportunities in the hillsides and low-density single-family residential neighborhoods. While the Proposed Plan includes some land use and zone changes in the hillside areas, none relate to increasing development rights. The zone and plan changes will preserve existing open space areas from development and will limit the density and scale of the hillside neighborhoods. The proposed land use and zone changes in the hillsides include changing existing single-family residential zoning in some areas to open space to correct for existing park uses or to reflect open space preservation purposes, as discussed in further detail below under "Land Use and Zone Changes in the Hillsides."

Proposed Plan Goals, Policies, and Programs for Hillsides

The proposed Community Plan policy document has goals, policies and implementation programs that protect hillside neighborhoods (including scale, density, visual character, and emergency access), open space, and wildlife. The goals, policies, and programs listed above all reflect the Proposed Plan's objective to direct growth away from the hillsides and open space. These goals, policies, and implementation programs would limit density in hillside areas; preserve the scale and character of residential neighborhoods; support secondary access for emergency access to hillside development to improve public safety; maintain, preserve, and enhance open space and recreational facilities; protect and preserve ridgelines, natural open space, wildlife habitat, and biological resources; prevent out-of-scale development in hillside neighborhoods; preserve the contours of natural ridgelines. The Proposed Plan does not include any policy direction to change zoning, land use designations, or other factors in a manner that would increase development density in the hillsides. See the Community Plan policy document Chapter 3: Land Use & Urban Form of the Draft Community Plan (Updated **Appendix D** included in the Final EIR) for policies that would limit development in the hillsides; Chapter 4: Public Realm and Open Space for policies that protect open space and wildlife; and Chapter 7 for the implementation programs.

The most relevant goals, policies and programs are listed below.

Goals and Policies

LU1.4 Hillside development. Limit density in hillside areas. Notwithstanding any land use designation maps to the contrary, all projects on properties designated under a Single Family land use designation (Minimum, Very Low II, Low I, or Low II) with average natural slopes in excess of 15 percent, shall be limited to the Minimum Residential General Plan land use designation (i.e., Minimum Density housing category of one dwelling unit per 40,000 square feet of lot area) for

the purposes of enforcing the slope density formula of LAMC Section 17.05C (Tentative Tract Maps) and 17.50E (Parcel Maps).

LU1.5 Slope density. Projects in the hillsides that request lot line adjustments, where either lot is subject to the Slope Density Ordinance prior to the lot adjustment, should include conditions of approval to document existing average natural slopes for the entire parcel and maintaining overall density restrictions pursuant to the intent of the slope density formula of Section 17.05.

Goal LU2: High quality single-family residential areas in the hillsides and flatlands that recognize the distinct scale and character of neighborhoods.

LU2.1 Preserve neighborhood scale. Preserve stable single-family zoned residential neighborhoods by preventing out of scale development. Ensure that new single-family construction is compatible with the scale and character of existing residential neighborhoods.

LU2.4 Hillside secondary access. Investigate and consider feasible secondary access connections as part of hillside subdivisions, as well as extensions, completions, and connections of existing street networks where feasible for emergency access to improve public safety in the hillsides.

LU2.5 Hillside neighborhood character. Consider the existing built character of distinctive hillside neighborhoods, including Laurel Canyon, Outpost Estates, and Hollywood Knolls, when reviewing discretionary development proposals.

PR3.1 Preserve open space. Maintain, preserve, and enhance open space, and recreational facilities, and park space within the Hollywood Community Plan Area. Encourage the retention of passive open space which provides a balance to the urban development of the Community Plan Area.

Goal PR.6: Protect existing natural areas and wildlife habitat.

PR6.2 Conservation. Preserve passive and visual open space that provides wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas, and other natural resources areas.

Implementation Programs

Implementation programs are mechanisms put in place to ensure that Community Plan goals and policies are realized, and are implemented in a variety of ways, including regulation and development review, financing and budgeting, and interdepartmental and intergovernmental coordination. Completion of a recommended implementation program will depend on a number of factors such as citizen priorities, finances, and staff availability. These recommendations are suggestions to City decision-makers. The following implementation programs are included as part of the Proposed Plan to protect hillsides:

P2 Maintain and enforce the City's Baseline Hillside Mansionization Ordinance, The Oaks' hillside zoning restrictions, and the Mullholland and Hollywoodland Specific Plans.

P3 Study hillside neighborhoods, including the Laurel Canyon, Nichols Canyon, Doheny Sunset Plaza and Los Feliz neighborhoods, to protect single family neighborhoods in the hillsides from out-of-scale "mansionized" development.

P4 Consider the development of a Ridgeline Protection Ordinance to preserve the contours of natural ridgelines and continue to study hillside regulation.

P5 Consider design standards to protect hillside neighborhoods from over-sized development. Further study R1 variation zones in the hillsides based on physical features such as lot size and slope.

P6 Evaluate additional or revised retaining wall regulations to improve the quality of hillside development.

P7 Coordinate with City Departments to further study ridgeline mapping in Hollywood to further inform hillside protection areas and improve regulations.
P120 Coordinate with agencies including the Department of Recreation and Parks to expand open space opportunities.
P122 Support the citywide Wildlife Pilot Study efforts to create development regulations for conserving biological resources in identified areas important for supporting habitat and movement for wildlife.
P123 Support related City, County, State, and Federal government ecological efforts.
P124 Identify and preserve wildlife habitats and ecologically improved areas in a natural state.
P136 Support the identification and mapping of paper streets in the hillsides.

In summary, many of the Proposed Plan goals, policies, and implementation programs seek to preserve the scale of single-family residential neighborhoods in the hillsides, limit density, preserve open space, and protect wildlife areas.

Proposed Land Use and Zone Changes in the Hillsides

The Hollywood hillsides have a range of small to large-sized single-family residential houses, biological resources, wildlife habitat, and a significant amount of open space (i.e., Griffith Park and a portion of the Santa Monica Mountains). The areas proposed for land use and/or zone changes in the hillsides are limited to Administrative Changes, which are consistency changes to the land use designation and/or zone to reflect the existing use. Within the hillsides, the Administrative Changes correct or update the existing land use and/or zone of lots and parcels to Open Space to reflect park/recreational space and open space preservation uses. Typically, these parcels or lots have single-family residential land use designations and zoning but should have the Open Space land use designation and corresponding Open Space zone. For example, Subarea 1:5 is vacant land within Griffith Park. It currently has a Minimum Residential land use designation with RE-40-1-H zone so the land use designation and zoning for this subarea is being corrected to Open Space and OS-1XL. Approximately 300 acres in the hillsides are being changed in this manner; the land is typically owned by a public agency, such as the City or the SMMC, and conservation land trusts, such as the Laurel Canyon Land Trust.

In addition to the proposed General Plan Amendments and zone changes that will update the land use designations and zoning to reflect the existing open space land uses on those parcels, the Proposed Plan also has other implementation mechanisms to limit future development and construction-related impacts in the hillsides. General Plan Footnote No. 1 on the proposed Hollywood Community Plan General Plan Land Use Map reinforces Policy LU1.4 stated above. Applicants seeking to increase density on single-family land use parcels with slopes exceeding 15 percent will need to request a discretionary General Plan Amendment, which will require a public hearing and City Council approval.

The Proposed Plan will also expand the coverage of the existing HCR Supplemental Use District by establishing another HCR to cover more hillside residential neighborhoods, including additional Hollywood Hills areas west of the 101 freeway, Hollywoodland, and a large portion of Los Feliz. The HCR does not encourage growth and does not change the underlying zoning (such as density, use, and height) of properties but, instead, adds construction regulations that limit grading quantities, hours of operation, and size of trucks allowed, for example, to reduce construction-related impacts in hillsides.

Proposed Plan and Wildfire Risk

As previously mentioned, the Proposed Plan directs growth away from hillsides. None of the proposed changes would promote development in the hillsides and thus, as discussed above, future development in the Hollywood CPA is not expected to increase wildfire risks in the hillside areas of the CPA. Additionally, research has shown that there is a negative correlation between population growth and recent wildfires. An article that was published in 2018 in the *International Journal of Wildfire*, "Historical Patterns of Wildfire Ignition Sources in California Ecosystems," found that although population continued to grow throughout the state from 1980 to 2016, population density exhibited a highly negative relationship with fire frequency in

most counties and forests, including Los Angeles County. Since 1980, ignitions steadily declined, yet areas burned (through 2016) have either not changed or have increased. As both population and development expand into wildland areas, ignitions increased up to a point at which the area of development far exceeds the area of wildland. At that point, the relationship becomes negative.[35] In recent years, California has experienced a number of massive fast-moving fires that have led to loss of life and property on an unprecedented scale. These fires start during extreme fire weather in the fall (e.g., during Santa Ana wind events), spread rapidly, and can get very large before a change in the weather gives firefighter the chance to stop them.[36] Due to climate change, some fires are now starting in the summer. The reasons for these fires are complex and thought to be related to climate change.[37]

Additionally, the Hollywood hillsides have established residential neighborhoods and many houses were built before 1990 when fire codes were less protective. Some of these homes may redevelop and some owners may build additions to their main structures, and when they do they will need to comply with stricter fire-resistant building codes.

New housing would be constructed according to the Los Angeles Fire Code requirements for fire-protection and would be subject to review and approval by the LAFD. The LAFD provides several fire development services to the City related to enforcing codes concerning new construction and remodeling, including Fire Life Safety Plan Checks and Fire Life Safety Inspections. The California Building Standards Code and Los Angeles Municipal Code include minimum requirements for driveway widths, the creation and maintenance of wildfire buffers, sprinklers, and alarms.

To the extent any project development is located in VHFHSZs or SRA as mapped by CAL FIRE and Fire Brush Clearance Zones, regulations require development to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply that would spread the intensity of a fire, compliance with provisions for emergency vehicle access, use of approved building materials and design, and compliance with LAFD hazardous vegetation clearance requirements pursuant to the Los Angeles Fire Code (2017). Part 9 of the CFC mandates minimum building requirements designed to "safeguards the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions… and provides safety and assistance to fire fighters and emergency responders." The requirements apply to the construction, alteration, movement, or movement of buildings, in addition to repairs, operation of equipment, use and occupancy of buildings, means of egress, evacuation plans, location, maintenance, removal, and demolition of every building or structure or any appurtenances. PRC Section 4290 establishes minimum standards related to defensible space, including provisions for pertaining to road standards for fire equipment access; standards for signs identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and fuel breaks and greenbelts. Applicable sections of the PRC mandate standards for firebreaks (Section 4292) and operation of power equipment (Sections 4427, 4428, 4431) intended to minimize risks in areas subject to wildfire. In addition, Government Code Section 66474.02, also known as the Subdivision Map Act, prohibits the subdivision of parcels in a VHFHSZ, unless a city or county planning commission finds that the subdivision design and location are consistent with defensible space regulations in PRC Sections 4290 and 4291, public fire protection services would be available for structures located throughout the subdivision, and road designs meet standards for fire equipment ingress and egress per PRC Section 4290 and any local ordinance. Provisions in the Los Angeles Fire Code reinforce State safety regulation by defining standards for the design of fire access roads (Section 503), mandating fire safety procedures for the construction and demolition of structures (Section 3301-3317), regulating the types of activities permitted within a VHFHSZ (Section 4908), and requiring that property

[35] Keeley, Jon E. and Alexandra D. Syphard, *International Journal of Wildland Fire*, "Historical Patterns of Wildfire Ignition Sources in California Ecosystems", 2018, available at https://www.publish.csiro.au/wf/pdf/WF18026.

[36] National Park Service, *Modern Fire History*, https://www.nps.gov/samo/learn/management/modernfirehistory.htm, accessed on July 2021.

[37] *Ibid.*

owners in a VHFHSZ clear brush and other native vegetation within a 200-foot radius of a building (Section 57.322).

The hillsides are also subject to the Red Flag Restricted Parking program, created by LADOT and LAFD, to increase public safety by removing illegally parked vehicles in posted locations within the VHFHSZ. The goal of this program is to educate the public on the potential hazards associated with a fast-moving brush fire, and the importance of keeping roadways clear and traffic moving. This program was implemented with the assistance of the City Council to remove vehicles that create a hazardous condition on Red Flag Days. Critical areas, including very narrow roads, hairpin turns, tight curves, where parked vehicles could delay citizens trying to evacuate and fire companies attempting to gain access during a Brush Incident were identified by Station Commanders. LADOT made 1,700 new signs and posted them in these identified areas, since January 1, 2006.

As discussed above, the Proposed Plan does not include components that promote population growth or increase population density in the hillsides. Rather, development will be directed away from hillsides and low-density single-family residential neighborhoods. Growth would be focused in portions of the Project Area that are highly developed with urban uses, particularly around transit systems, hubs, and corridors. Also as discussed above, development in the hillsides is required to comply with existing regulations that protect hillsides from wildfire risks, as well as future regulations when approved. These requirements include brush clearing; creating defensible space; constructing structures that are more resistant to wildfires, and maintaining emergency access by limiting the number of, size of, and time of day haul trucks can travel along hillside roads. These regulations would limit the amount of property loss due to wildfires. The Proposed Plan does not conflict with these regulations. Rather, development in the hillsides will be required to comply with all applicable regulations that limit wildfire risks. The Proposed Plan directs growth away from the hillsides and would not exacerbate existing wildfire risks.

Hillside Infrastructure

As discussed above, the Proposed Plan is not anticipated to induce or cause additional development/redevelopment in the hillsides. The Proposed Plan does not directly promote tourism in the hillsides or the increased use of hillside infrastructure (e.g., pipes and roads). Rather, the Proposed Plan includes restrictions that tend to limit the density of new hillside development and implement additional construction-related regulations through the new HCR. The Proposed Plan would not exacerbate existing challenges associated with deteriorating hillside infrastructure, hillside access, and hillside tourism. Thus, deteriorating hillside infrastructure, hillside access, and adverse effects associated with hillside tourism would not be attributable to the Proposed Plan and, therefore, mitigation under CEQA is not appropriate.

Regarding comments stating that the current hillside roadways are substandard, as noted throughout this Final EIR, the development envisioned as a result of the Proposed Plan would not primarily occur in the hillside area. New development, including building additions, in hillsides is required under the LAMC to improve substandard streets. It is also reviewed by LAFD and LADOT to ensure that access is provided for emergency response. Projects within the HCR District that have a residential floor area of 17,500 square feet or greater would also be subject to Site Plan Review. This would be a discretionary review process and project approval would require findings that the project consists of an arrangement of buildings and structures, off-street parking, loading areas, lighting, landscaping, trash collection, and other pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties.

In response to comments regarding disaster preparedness and emergency evacuation, Policy LU13.6, Disaster Preparedness, states the following: Improve preparedness for disasters, including those related to climate change. Coordinate with other City departments to assess preparedness for increased frequency of extreme weather events, such as heat waves, drought, wildfires, flooding, and sea level rise. In response to this policy, Implementation Program P19 indicates that the City will study and update evacuation routes for

hillside areas and implement clear and consistent signage to delineate no street parking on Red Flag Days for hillside streets in designated VHFSZ.

There is no evidence to support that the new development will result in significant impacts to the environment from substandard streets. Therefore, these streets would continue to operate as they do currently, and there is no substantial evidence that the Proposed Plan will result in a significant impact.

See **Master Response No. 4 – Infrastructure**, for impacts related to water and sewer conveyance facilities, which is applicable to infrastructure in the hillsides. See **Master Response No. 7 – Biological Resources**, for impacts related to biological resources which is applicable to impacts to biological resources in the hillsides.

Conclusion

Future single-family residential development in the Hollywood hillsides will continue to be subject to existing regulations and ordinances. In addition, development regulations are becoming stricter with the Proposed Plan. The Proposed Plan includes goals, policies, and programs to protect hillside neighborhoods and to protect open space and wildlife areas. Land use and zone changes are proposed to ensure that open space areas in the hillsides are maintained. The Proposed Plan is not anticipated to induce or cause additional development in the hillsides. Therefore, the Proposed Plan will not foreseeably cause, result in, or induce additional development or construction activities in the hillsides, and will not exacerbate existing conditions and existing impacts related to hillside infrastructure, emergency access, construction, open space/wildlife preservation, wildfire risks, visual character, and scale.

3.3 SUMMARY COMMENTS AND RESPONSES TO INDIVIDUAL COMMENTS

LETTER NO. 1

Miya Edmonson, IGR/CEQA Branch Chief
California Department of Transportation (Caltrans)
District 7 – Office of Regional Planning
100 S. Main St., MS 16
Los Angeles, CA 90012

Response 1-1

The commenter summarizes the reason for preparing the Proposed Plan as resulting from a legal challenge of the 2012 Approvals and that the Proposed Plan updates and addresses the changes that have occurred since the adoption of the Existing Plan that was adopted in 1988.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 1-2

The comment notes that the nearest State facilities to the Plan are US-101, SR-2, SR-134, and I-5, and that while there may not be direct adverse impacts to the State facilities the City should consider the potential significant cumulative impacts generated by future growth. This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated in 2019 to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. As explained on page 4.15-5 of the recirculated Section 4.15, the City of Los Angeles opted out of the CMP in July 2019 upon the adoption of the City's new CEQA metrics for transportation, and on August 28, 2019 the City was notified by Metro that the provisions of the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. The statewide adoption of new CEQA guidelines also pertains to the operations of the freeway system under Caltrans control.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 1-3

The commenter is encouraging the implementation of active transportation amenities to provide an alternative to driving knowing that identifying viable solutions to reducing congestion on State facilities is challenging and offers to work with the City to look for opportunities to develop projects that improve safety and connectivity for pedestrians and bicyclists. The commenter also mentions their desire to provide equitable mobility options and requests that the City evaluate future development for access, VMT and service needs. The Proposed Plan includes multiple goals and policies focused on sustainability, safety and active transportation and includes transportation improvements focused on biking, walking and transit as shown in the recirculated Transportation section of the EIR in Figure 4.15-7 and in Table 4.15-7. As noted in the previous response, this comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated in 2019 to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743, as described in as described in **Master Response No. 8 –**

Transportation & Traffic. Several of the relevant goals and policies from the Proposed Plan are listed below.

Goal/Policy	Description
Goal M.1	Safe, accessible, and convenient mobility options for users of all ages and abilities.
Policy M1.1	Mobility for all modes. Maintain the street system to facilitate the mobility of all modes. Support the maintenance and rehabilitation of all Streets and Highways.
Goal M.2	A transportation system that provides abundant convenient alternatives to single-driver motor vehicles.
Policy M2.1	Sustainable mobility options. Encourage sustainable mobility options. Support transportation options for persons who do not have cars or want to use their cars less and promote the use of taxis, rental cars, shared cars, shared bicycles, van pools, shuttles, secure bicycle parking, consolidated pick-up and drop-off areas for Transportation Network Companies (TNCs), and other short trip and first/last mile connections to transit. Encourage the location of these services and bus layovers near Metro Rail Stations and major transit nodes.
Goal M.5	A safe and integrated bicycle network that provides access to transit and key destinations.
Policy M5.1	Safety and convenience. Support and encourage bicycling as a mobility option by supporting infrastructure, facilities, and programs that create a safe and convenient environment to ride bicycles.
NOTE: This table contains a sample of the goals and policies related to safety and active transportation. See the Hollywood Community Plan for the full list of goals and policies. **SOURCE**: City of Los Angeles. *Draft Hollywood Community Plan*, 2021.	

Please also see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 1-4

The commenter encourages mitigation measures that focus on reducing VMT and GHG emissions, such as transit or transportation demand management (TDM). The Proposed Plan includes multiple goals and policies focused on the types of mobility improvements requested by the commenter as illustrated in the table in **Response 1-3**, which contains transportation improvements focused on biking, walking and transit as shown in Figure 4.15-7 and in Table 4.15-7, and includes auto-trip reduction strategies in the transportation improvement project list as shown in Table 4.15-6. The goals and policies listed under **Response 1-3** includes several of the additional goals and policies in the Plan related to transit and TDM.

Response 1-5

The comment states that if residential development is being considered near a freeway or highway, soundwalls or other noise attenuation should be implemented in zoning and design.

Ambient noise levels are typically elevated near freeways and these noise levels may affect residential land uses. All new construction under the Proposed Plan would be required to comply with sound transmission control requirements included in the International Building Code, which are the basis for the 2016 California Building Code (CBC) noise insulation standards (CBC Title 24, Section 1207.4). The CBC standards are incorporated into the City of Los Angeles Building Code (LAMC Section 91). The standards require that intrusive noise not exceed 45 dB in any habitable room. These building code requirements ensure that residential land uses are constructed in a manner that ensures acceptable noise levels in interior areas. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 1-6

The comment states that American Disability Act (ADA) curb ramps located within Caltrans jurisdiction must meet the current California Department of Transportation (Caltrans) standard and should be checked by the Caltrans ADA Coordinator from Traffic Engineering. The curb ramps within the Caltrans Right-of Way may need to be upgraded to current standards.

The comment is noted; the City requires new curb ramps to be ADA compliant. The City or individual project applicant will coordinate with Caltrans if a new development project involves new curb ramps or other changes within Caltrans jurisdiction. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 1-7

The comment states that any work to be performed within the State Right-of-Way will need an Encroachment Permit and any transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a Caltrans transportation permit. The commenter recommends that large size truck trips be limited to off-peak commute periods.

The comment is noted; the City follows a standard set of guidelines relating to traffic management plans during construction of a new land use project. The City or individual project applicant will coordinate with Caltrans when a transportation or encroachment permit is necessary. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 1-8

The comment states that future projects need to discharge clean stormwater run-off and are not permitted to discharge onto State highway facilities.

As discussed in Section 4.9, Hydrology and Water Quality, of the EIR, all construction activities would be subject to applicable requirements of the City's Standard Urban Stormwater Mitigation Plan (SUSMP), Stormwater and Urban Runoff Control Ordinance, and Low Impact Development Ordinance to address stormwater pollution. These requirements are enforced through the City's plan approval and permit process, and all new individual projects are subject to City inspection. Compliance with the existing regulatory framework would ensure that construction does not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. The EIR concluded that the Proposed Plan would result in a less than significant impact from runoff (see Draft EIR on pages 4.9-27 and 4.9-28). No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 2

Ali Poosti, Division Manager
Los Angeles Bureau of Sanitation (LASAN)
Wastewater Engineering Services Division

Response 2-1

The comment states that the Project Description for the Proposed Plan lacks sufficient detail for LASAN to conduct a thorough capacity analysis because descriptions for individual proposed developments are needed to assess sewage generation. The commenter requests that LASAN is notified when additional information for environmental review is available for the Proposed Plan.

The comment is noted. The EIR appropriately provides a programmatic analysis of the Hollywood Community Plan Update. No individual development projects are proposed as part of the Proposed Plan. As individual developments are proposed, developers are required to contact LASAN to ensure sewer availability. The impact discussion under Impacts 4.16-3 through 4.16-6 in Section 4.16, Utilities and

Service Systems, of the EIR addresses how the Proposed Plan would impact wastewater, specifically if it would exceed wastewater treatment requirements, if it would require or result in construction of a new wastewater treatment facility or stormwater drainage facility, or expansion of an existing facility. The EIR concluded that the Proposed Plan would have a less than significant impact; see pages 4.16-25 through 4.16-39 for discussion. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 3

Ali Poosti, Division Manager
Los Angeles Bureau of Sanitation (LASAN)
Wastewater Engineering Services Division

Response 3-1

On January 31, 2019, LASAN sent an email stating that the follow-up comment letter attached to the email supersedes the previous response sent on the Proposed Plan. The comment letter is in response to DCP's November 15, 2018 letter (Notice of Availability) requesting a review of the hydraulic conditions of the CPA. LASAN indicates that it conducted a preliminary evaluation of the most up-to-date hydraulic conditions for the wastewater and stormwater systems within the CPA. The evaluation addressed cumulative sewer impacts and is helpful in understanding where future sewer improvement projects may be needed to provide future capacity as the CPA develops. The evaluation was performed through the collaborative efforts of four groups within the Wastewater Engineering Service Division of LASAN to aid in determining current hydraulic conditions, as well as the available capacity for current and future developments.

This is consistent with the analysis in the EIR. As noted on page 4.16-29 of the EIR, implementation of the Proposed Plan would not result in significant impacts to wastewater treatment requirements and would therefore not make a cumulatively considerable contribution or impact related to wastewater. While routine infrastructure projects involving replacing or upgrading sewer lines would generally result in the preparation of a Mitigated Negative Declaration (MND), or in some cases, a Categorical Exemption. The impact discussion under Impacts 4.16-3 through 4.16-6 in Section 4.16, Utilities and Service Systems, of the EIR addresses how the Proposed Plan would impact wastewater, specifically if it would exceed wastewater treatment requirements, if it would require or result in construction of a new wastewater treatment facility or expansion of an existing facility.

The EIR concluded that the Proposed Plan would have a less than significant impact; see pages 4.16-22 through 4.16-27 for discussion. The comment is a summary of analysis undertaken by LASAN: no further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 3-2

LASAN describes the responsibilities of WESD's four groups: Primary Planning Group, Secondary Planning Group, Geographical Information Systems (GIS) Group, and Capacity Assurance Group. LASAN indicates that the CPA currently has 24.8 miles of primary sewer in operation and that recent gauging information from 76 sites shows average gauge readings at 35 percent. LASAN notes that the CPA has 311.2 miles of secondary sewers that are currently in operation and that wastewater in the CPA is conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity to support the wastewater generated in the planning area by the Proposed Plan.

LASAN's information is noted; no response is required because LASAN does not raise any new significant environmental issues and provides information that is consistent with the wastewater analysis included in the EIR, which concluded that the Proposed Plan would not result in significant impacts related to wastewater. Please see **Response 3-1** and **Master Response No. 1 – General Comments and Non-CEQA Issues** and the wastewater discussion included **Master Response No. 4 – Infrastructure**.

Response 3-3

The LASAN Watershed Protection Program (WPP) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City. LASAN anticipates that the Proposed Project would require the implementation of stormwater mitigation measure that requires the Proposed Project to comply with all mandatory provisions to the Stormwater Pollution Control measures for development projects which are subject to compliance with the LID Ordinance. LASAN notes that applicants are required to submit a LID Plan to WESD for review and approval prior to the issuance of grading or building permits. The LID would be required to be prepared consistent with the requirements of the Development Best Management Practices Handbook. LASAN advises that development projects within the Proposed Plan Area can seek WPD input regarding LID requirements in the early phases of the project from WPD's plan-checking staff. In addition, the comment states that current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures.

As discussed in Section 4.9, Hydrology and Water Quality, of the EIR, future development in the CPA would be subject to National Pollution Discharge Elimination System (NPDES) permit requirements and the City's LID Ordinance. All development or redevelopment that is 500 square feet or more in size would be required to capture and manage 100 percent of the first three-quarter-inch of stormwater on-site by implementing best management practices for on-site infiltration, capture and use, and biofiltration/bio-treatment. In addition, applicants of development projects would be required to comply with LASAN WPD permit requirements prior to the issuance of grading or building permits.

LASAN's information is noted; no response is required because LASAN does not raise any new significant environmental issues and provides information that is consistent with the environmental analysis included on pages 4.16-22 through 4.16-27 of the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 3-4

LASAN notes that the City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and the sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. LASAN describes elements of the Green Street Initiative.

As discussed on pages 4.9-22 and 4.9-23 of Section 4.9, Hydrology and Water Quality, of the EIR, individual development projects are required to comply with all City requirements, including the City's Stormwater and Urban Runoff Pollution Control (SUSMP) Ordinance which requires projects to address stormwater pollution from construction and redevelopment. Compliance must be demonstrated by the project proponent to have been incorporated into the project's design before permits for project construction would be issued.

Response 3-5

LASAN notes that all construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the raining season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

As discussed on pages 4.9-22 and 4.9-23 of Section 4.9, Hydrology and Water Quality, of the EIR, individual development projects would be required to comply with all federal, state, and City regulations related to stormwater control to ensure that future development does not result in substantial stormwater pollution.

Response 3-6

LASAN describes the role of Los Angeles Department of Water and Power (LADWP) in supplying water and power to the residents and businesses in the City of Los Angeles and explains the requirements of extracting groundwater within the City.

As discussed on page 4.9-24 of Section 4.9, Hydrology and Water Quality, of the EIR, implementation of the Proposed Plan would not involve direct groundwater withdrawal or injection that would create a net deficit in aquifer volume, yields, change the rate or direction of groundwater, or deplete groundwater supplies. Implementation of the Proposed Plan would not result in a demonstrable or sustained reduction of groundwater recharge capacity such that there would be a lowering of the local groundwater table level. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 3-7

LASAN describes the amendment to the City of Los Angeles Building Code that requires developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain. LASAN also describes the beneficial use of groundwater and includes a description of the Technical Assistance Program offered by LADWP to help offset costs of water conservation and reuse systems for qualified projects, as well as other incentive and rebate programs.

As discussed on pages 4.9-23 and 4.9-24 of Section 4.9, Hydrology and Water Quality, all development projects in the CPA are required to comply with the City of Los Angeles Building Code, which includes the beneficial reuse of groundwater. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 3-8

LASAN explains that the City requires all proposed residential development of four or more units or where the addition of floor area is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more, to set aside a recycling area or room for on-site recycling activities.

As discussed on pages 4.16-31 through 4.16-36 all development projects in the CPA are required to comply with the City's regulations, including on-site recycling requirements for residential developments. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 4

Georgia Sheridan, AICP, Senior Manager
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Los Angeles, CA 90012

Response 4-1

The comment describes the Proposed Plan and expresses Metro's commitment to working with stakeholders to support the development of transit-oriented developments.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 4-2

The comment summarizes the purpose of the letter, and notes that the Metro Adjacent Development Handbook and the Adjacent Construction Manual are attached. The comment states that demand for transit in Hollywood is high and is expected to grow, and Metro requests coordination with DCP to determine future bus layover zone consolidation and expansion. Metro also requests the Community Plan text include language about Metro's notification procedures and considerations for projects located near a Metro facility that may impact Metro bus operations. Metro also provides recommendations on right of way design for bus facilities.

Although no response is required here as the comment relates to the Proposed Plan and does not pertain to the EIR, the following is provided for clarification: The Community Plan text (**Appendix D**, Updated Hollywood Community Plan, of this Final EIR), includes Policy M4.10 'Pick up Zones' to support the location of taxi, bus stop, and bus layover zones, shared and on-demand mobility, shuttles, and passenger pick up zones on corridors near Metro stations and major pedestrian destinations. Long term Implementation Programs P89 and P90 (included in the Updated **Appendix D**) call for coordination with Metro and LADOT to provide feedback that will improve local, Metro Rapid and community-level bus service in Hollywood and to identify and secure spaces that accommodate both consolidation and expansion of bus layover zones. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 4-3

The comment describes the frequency of rail service in the Plan Area and requests that the Community Plan include policy language for early coordination with Metro for projects within 100 feet of Metro tunnels. The comment also requests language be added to the Community Plan text to require noise easements for sensitive uses within 250 feet of the Red Line Tunnel.

Although no response is required here as the comment relates to the Proposed Plan and does not pertain to the EIR, the following is provided for clarification: The Community Plan text (included in the Final EIR Updated **Appendix D**) includes Policy M4.16 'Metro review', which states that development within 100 feet of a Metro facility will require Metro review and approval, including compliance with the Metro Adjacent Development Handbook. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 4-4

The comment requests that additional policy language be added to the Community Plan text to encourage transit supportive public realm improvements and requests the City to consider requiring transit supportive amenities as conditions of approval for projects within the Plan area.

Although no response is required here as the comment relates to the Proposed Plan and does not pertain to the EIR, the following is provided for clarification: The Community Plan text (included in the Final EIR Updated **Appendix D)** includes mobility policies that address this topic, including ones that support the development of mobility hubs at key destinations (Policy M4.5) and the provision of enhanced amenities at major transit stops, including pedestrian waiting areas, comfortable seating, and shade trees (Policy M4.6). Please refer to Chapter 6: Mobility and Connectivity in the Community Plan and Chapter 4: Public Realm, Parks, and Open Space for policies that support enhancing the public realm for pedestrians. Available as a Citywide resource, there is a Mobility Hub Reader's Guide for enhancing project developments and public right-of-way improvements in proximity to existing or new transit stations with amenities, activities, and programs to support multi-modal connectivity and access. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 4-5

The comment encourages the City to promote bicycle use through well designed bicycle storage, both short term and long term. The comment also requests that the Plan should help facilitate safe and convenient connections for pedestrians and bicyclists.

Although no response is required here as the comment relates to the Proposed Plan and does not pertain to the EIR, the following is provided for clarification: The Community Plan text (included in Final EIR Updated **Appendix D)** includes mobility and bicycling policies that address these topics in Chapter 6: Mobility and Connectivity, such as Policy M4.7 'Access,' mobility and connectivity, which supports improved transit access, multimodal mobility, and connectivity. Available as a Citywide resource, there is a Mobility Hub Reader's Guide that addresses best practices for bicycle parking. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 4-6

The comment requests that additional policy language be added to the Community Plan text to provide wayfinding signage to transit services.

Although no response is required here as the comment relates to the Proposed Plan and does not pertain to the EIR, the following is provided for clarification: The Community Plan text (Final EIR updated **Appendix D)** includes a policy (M4.6) that supports wayfinding signage that directs pedestrians to transit stops, and stations, and from transit facilities to point of interest in the surrounding neighborhood. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 4-7

The comment states that Metro encourages art in public spaces and will need to review any proposals for art and/or placemaking facing Metro right-of-way in the future.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 5

Katy Sanchez, Associate Environmental Planner
Native American Heritage Commission
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691

Response 5-1

The comment cites the sections of CEQA and CEQA Guidelines that require a project to prepare an EIR if the project has the potential to have a significant effect on the environment and that a project may have a significant effect on the environment if it may cause a substantial adverse change in the significance of a historical resource.

Section 4.5, Cultural Resources, of the EIR identifies the historic, and discusses potential archaeological, tribal, and paleontological resources within the CPA and finds that the Project would have a significant and unavoidable impact on historic resources. Impacts to archaeological, paleontological and tribal resources are considered less than significant after mitigation. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 5-2

The comment summarizes SB 18 and AB 52, which require tribal consultation as part of the CEQA process. The comment also provides recommendations of the Native American Heritage Commission to assess the existence and significance of tribal cultural resources.

As discussed in Section 4.5, Cultural Resources, of the EIR, the City sent letters to the California Native American Tribes that requested inclusion on the AB 52 notification list. No potential tribal resources were identified during the consultation process as either listed or eligible for listing in the California Register or in a local register of historical resources. The EIR concluded that the Proposed Plan would have a less-than-significant impact on tribal resources with implementation of mitigation measures. As noted on page 4.5-49 and 4.5-50 of Section 4.5, the mitigation measures include notification to the California Native American tribes for all discretionary projects where excavation could extend below previously disturbed levels, as well as a list of best practices to ensure that tribal resources are not damaged. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The City, as a charter city, is not subject to SB 18. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 6

Malinda Stalvey, Interim Team Manager
Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012

Response 6-1

This comment describes the Proposed Plan, and the type of service provided by the Metropolitan Water District, a public agency and regional water wholesaler.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 6-2

This comment describes the public agency's Santa Monica Feeder pipeline located within the western Project Area limits. The agency expresses concern about potential impacts to the pipeline and rights-of-way as a result of implementation of the Proposed Plan.

The Proposed Plan includes proposed land use and zoning changes in selected areas of the Project Area to accommodate anticipated growth, but the Proposed Plan does not propose or entitle any specific development projects. The City and individual project applicants will continue to coordinate and are subject to comply with the Metropolitan Water District's construction, project development, and project siting requirements as applicable. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 6-3

This comment states that Metropolitan must be allowed access to its right-of-way and facilities and that the agency requires any project that may affect its rights-of-way to submit plans for Metropolitan's review and written approval. The agency requests that any future design plans associated with the project be submitted to Metropolitan's Substructures Team for approval. The comment states that the Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan Facilities, and Rights-of-Way is attached. This comment requests the City to consider Metropolitan's easements during the planning process and avoid any potential impacts to the Santa Monica Feeder and its structures due to the implementation of the Proposed Plan.

Please refer to **Response 6-2**.

Response 6-4

This comment requests the City to consider Metropolitan's easements during the planning process and avoid any potential impacts to the Santa Monica Feeder and its structures due to the implementation of the Proposed Plan, or where applicable propose mitigation measures to offset any potential impacts. Although Metropolitan generally and broadly requests the City to avoid impacts and propose mitigation measures it does not identify any potential significant impacts or provide any substantial evidence of an impact. Therefore, no further response is required.

Please refer to **Response 6-2**.

Response 6-5

This comment states that Metropolitan encourages water conservation measures in its service area and states that Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, irrigation with storm water, and reclaimed water to offset any increase in water use associated with the proposed project.

Although no response is required, the following is provided for clarification: The Community Plan (Final EIR Updated **Appendix D**), includes water conservation measures, such as policy LU11.4 Conserve Water, which supports policies that conserve water, recharge local groundwater aquifers and reduce the pollution of water resources and to meet increases in the demand for water through conservation and recycling. Providing Citywide guidance, the City of Los Angeles published the Sustainable City Plan (pLAn) as indicated in the regulatory framework in Section 4.16, Utilities and Service Systems, of the EIR, on page 4.16-42. Most recently the Sustainability Plan includes "Green New Deal" policies, which also address water conservation. Water conservation measures that are regulatory, such as the ones described by the commenter, are not included as mitigation measures because they are already required by the City's Green Building Code or City ordinances, for example. Impact 4.16-2 in Section 4.16, Utilities and Service Systems, of the EIR concludes a less than significant impact with regard to whether implementation of the Proposed Plan would have insufficient water supplies available to serve the Project Area from existing entitlements or resources or result in new or expanded entitlements needed. Please refer to pages 4.16-15 and 4.16-16 of the EIR. Please also refer to **Response 6-2**.

LETTER NO. 7

Scott Morgan, Director
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95812

Response 7-1

The comment states that the State Clearinghouse (SCH) submitted the EIR to selected state agencies for review and the letter includes the comment letters on the EIR that were received by SCH. The comment letter from Caltrans and Native American Heritage Commission are the same as Comment Letters 1 and 5, respectively. Please refer to **Responses 1-1** through **1-8** and **Responses 5-1** through **5-2**.

LETTER NO. 8

Lijin Sun, J.D., Program Supervisor
SCAQMD
21865 Copley Drive
Diamond Bar, CA 91765

Response 8-1

This comment summarizes Chapter 3.0, Project Description and the air quality analysis in Section 4.3, Air Quality, of the EIR.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 8-2

This comment summarizes the 2016 Air Quality Management Plan (AQMP) and identifies that the most significant air quality challenge facing the South Coast Air Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_X) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 8-3

This comment summarizes South Coast Air Quality Management District's (SCAQMD) concerns regarding use of a 2016 baseline to determine the level of significance for the buildout scenario in the year 2040. The comment refers to an attachment. For clarification, the Proposed Plan is based on Reasonably Expected Development not a full buildout scenario; see Appendix B: Methodology for more information. See **Responses 8-6, 8-7,** and **8-8** for a comprehensive response to the issues raised in this summary comment.

Response 8-4

The comment summarizes the National Ambient Air Quality Standard with respect to ozone and indicates that using a different baseline, especially for nitrogen oxide (NO_X) emissions, may identify significant impacts requiring the adoption of all feasible mitigation measures. The comment refers to an attachment. See **Responses 8-6** through **8-15** for a comprehensive response to the issues raised in this summary comment.

Response 8-5

The comment restates CEQA requirements and indicates that issues should be addressed in detail giving reasons why specific comments and suggestions are not accepted. See **Responses 8-6** through **8-15** for a comprehensive response to the issues raised in this summary comment.

Response 8-6

The comment suggests that the use of the Existing Plan conditions in 2016 as the CEQA baseline for comparative emissions analysis may have led to an underestimation of the air quality impacts resulting from project implementation, and that the EIR should include a "realistic baseline" which accurately reflects improvements in air quality that will occur independent of the Proposed Plan. The comment also suggests that the incremental increase in daily operational emissions of NO_X between the Future No Project/Existing Plan and the Proposed Plan in 2040—approximately 121 pounds per day as presented in Table 4.3-10 of the EIR—would be greater than the SCAQMD operational NO_X threshold of 55 pounds per day and that incremental increase would be considered a potentially significant air quality impact. The rationale of the comment warrants a multifaceted response considering the appropriateness of the use of Existing Conditions as the baseline for comparing emissions, whether the EIR analysis took credit for improvements in air quality that will occur independent of the Proposed Plan, and whether the difference in emissions between the Future No Project/Existing Plan and the Proposed Plan in 2040 would constitute a potentially significant impact in the context of District guidance for CEQA projects.

The City agrees with the State Supreme Court ruling that, "the public and decision makers are entitled to the most accurate information on projects practically possible, and the choice of a baseline must reflect that goal" (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310). The ruling further noted that, "use of existing conditions as a baseline makes the analysis more accessible to decision makers and especially to members of the public, who may be familiar with the existing environment but not technically equipped to assess a projection into the distant future." In another more

recent case, the *Neighbors for Smart Rail vs. Exposition Metro Line Construction* lawsuit challenged Metro's use of the future no project condition instead of the existing condition for assessing project impacts. The Court ruled that a lead agency has discretion to omit existing conditions analyses by substituting a baseline consisting of environmental conditions projected to exist solely in the future, but to do so the agency must justify its decision by showing an existing conditions analysis would be misleading or without informational value. The SCAQMD seems to indicate that the default position should be the Future No Project condition and that the analysis presented in the EIR is misleading; however, this interpretation is inconsistent with the court ruling in *Communities for a Better Environment vs. South Coast Air Quality Management District*, which was based on the SCAQMD using historical data and permitted capacity to establish the existing condition instead of the actual existing data. In that case, the Court rejected a hypothetical maximum operating capacity as not representing an accurate environmental baseline.

There is no substantiation for why the analysis using Existing Conditions as the baseline would be considered misleading or without informational value. The City's characterization of air quality emissions under Existing Conditions is based on the SCAG regional transportation model, City land use data, and the preferred regulatory models for estimating air pollutant emissions associated with land use development and transportation projects under CEQA.

This combination of data resources and emissions estimation methodologies represents the most accurate set of tools for assessing air quality impacts in environmental documents at the plan level. Furthermore, the baseline selected in the EIR is consistent with the baseline relied upon in the City's most recent community plan EIRs—including the West Adams and South/Southeast Los Angeles Community Plan EIRs—as well as the SCAG 2016-2040 RTP/SCS Program EIR and the latest 2020-2045 RTP/SCS (Connect SoCal) Program EIR. These plan-level documents reflect that the existing conditions have been successfully used as a CEQA baseline in other similar projects without receiving a comment from the SCAQMD. The use of the existing conditions as the CEQA baseline is reasonable based on these precedents and based on the rationale provided herein.

To the extent that the comment states that the City is improperly taking credit or misleading the public by treating the Proposed Plan as an "emission reduction project," this is inaccurate. The emissions associated with operation of reasonably expected development under the Proposed Plan were estimated using output from SCAG regional transportation modeling, preferred regulatory emissions models, and the most reliable growth projections data available from the City. As stated above, the analysis presented incorporated the most accurate information practically possible, and the use of Existing Conditions as the baseline provides the most accessible analysis to decision makers and especially the public. Importantly, the EIR in Table 4.3-10—which is copied into the commenter's comment letter—clearly discloses the differences between the emissions from the Proposed Plan and the Future No Project/Existing Plan. The Future No Project/Existing Plan analysis is based on the assumption that no changes to the Existing Plan would occur between Existing Conditions and 2040. Additionally, the EIR clearly discloses within its analysis that the reason for the lower vehicle emissions in the future with the Proposed Plan is because of increased state and federal rules and regulations. At page 4.3-25 of the EIR reads:

> While emissions from mobile sources are generally expected to decrease over time as a result of statewide emission reduction measures, the anticipated ambient growth in residential housing and non-residential reasonably expected development under the Proposed Plan would result in increased use of consumer products and natural gas.
>
> …
>
> With regards to mobile sources, as shown in Table 4.3-10, future daily regional emissions under implementation of the Proposed Plan are generally expected to decrease relative to existing emissions. This trend is primarily attributed to programmed improvements in vehicular engine efficiency technologies and fuel pollutant concentrations, as well as fleet

> turnover and the addition of more alternative fuel vehicles, that are projected to occur between existing conditions and 2040 resulting in more stringent statewide regulations promulgated by CARB.

Therefore, the analysis is not taking credit for emissions reductions; rather, the emissions analyzed represent the most accurate characterization practically possible using the appropriate methodologies in accordance with legal precedent. Furthermore, the emissions presented for the Proposed Plan and the Future No Project/Existing Plan in 2040 represent conservative estimates of emissions associated with Title 24 energy sources and other building energy sources, as the CalEEMod emissions are based on 2013 Title 24 building standards. The Title 24 building standards are enhanced every three years, and beginning on January 1, 2020, all new construction in the Project area will be required to comply with 2019 Title 24 standards, which will reduce emissions associated with end uses regulated under the standards. Further improvements in future years that will be enacted through Title 24 and implemented through the Los Angeles Green Building Code will reduce emissions of NO_X and CO in the analysis year of 2040.

The comment identifies that if the appropriate comparison for determining level of significance were a comparison between Future with the Plan and Future No Project/Existing Plan (rather than the comparison to Existing conditions that is used in the EIR), the increase in NO_X emissions (121 pounds per day) would be greater than the SCAQMD mass daily threshold of significance for operational emissions (55 pounds per day). The discussion above substantiates the validity of the EIR's use of Existing Conditions as the baseline for determining significance, and the District's *CEQA Air Quality Handbook* acknowledges that, "the final determination of whether or not a project is significant is within the purview of the lead agency pursuant to Section 15064(b) of the CEQA Guidelines" (SCAQMD, 1993). The comment suggests that an increase of 121 pounds per day of NO_X at the Plan level (Future with Plan compared to Future without Plan)—spread across 13,962 acres (approximately 21.8 square miles)—should be considered a significant air quality impact under CEQA. In considering this increase in NO_X when comparing these scenarios, the City recognizes the following:

- The SCAQMD Air Quality Significance Thresholds were developed primarily for the use in the evaluation of individual projects (the District's *CEQA Air Quality Handbook* originally provided screening tables for individual land use development projects, not plan-level projects; SCAQMD has not developed thresholds specifically for plan-level projects). The *Handbook* states: "[t]he District developed these thresholds, in part, based on Section 182 (e) of the federal Clean Air Act which identifies ten tons a year of volatile organic gases as the significance level for stationary sources of emissions in extreme non-attainment areas for ozone… This emission threshold has been converted to a pounds per day threshold for the operational phase of a project." Therefore, the thresholds for VOC and NO_X were originally derived based on USEPA criteria for significant stationary sources of ozone precursor emissions in extreme nonattainment areas, using the combination of operational stationary and mobile sources for land use projects as a surrogate for stationary sources under the federal regulations. The applicability of the Air Quality Significance Thresholds at the Plan level is not consistent with guidance referring to the land use screening tables provided in the original *Handbook* and is ultimately at the discretion of the Lead Agency.

- The Hollywood CPA spans 13,962 acres, approximately 21.8 square miles. Implementation of the entire Proposed Plan would increase NO_X emissions throughout this area; however, a more refined geospatial analysis of where the emissions increases would be occurring is not feasible given the geographic extent of the Hollywood CPA. The mass quantity of the incremental increase in emissions (121 pounds per day) is less than the District's operational localized significance threshold (LST) forfive-acre project sites in this area (161 pounds per day). The LST for 5-acre sites was identified as a safe threshold below which air quality violations would not be of concern. Furthermore, the magnitude of the incremental increase in emissions spread over the entire Hollywood CPA would be less than 0.01 pounds per day of NO_X per acre. The incremental increase in emissions would result in a negligible difference in regional

air quality and would not conflict with or obstruct implementation of the applicable air quality plan or present the potential for exposing sensitive receptors to substantial pollutant concentrations. This exercise demonstrates the challenges in using project-specific thresholds to evaluate plan-level air quality impacts.

The City finds the use of a Future No Project/Existing Plan baseline to be hypothetical and misleading, in part based on the limitations of the available model. Based on the commenters' reasoning that the No Projects/Existing Plan will have impacts of lower magnitude because it will have less "development activities" than the Proposed Plan. But the assumption is that those development activities will not occur anywhere else otherwise. Such an assumption is not reasonably supported. The Proposed Plan is intended to accommodate growth. If the growth does not occur in the Proposed Plan Area that does not mean it will not occur in the air basin. It would be difficult to accurately characterize the impacts to the air basin quantitatively based on the limitations of the existing models. But on a qualitative basis, the Proposed Plan is transit friendly, which is compatible with the 2016-2040 RTP/SCS and all air quality plans to reduce emissions from land use development. The City must accommodate growth and the Plan seeks to focus this growth near transit. A transit friendly plan is one of the best ways to accommodate growth from an air quality perspective. The per capita vehicle miles traveled (VMT) is 18.3 in the Existing Condition, 16.5 for the Future No Build/Existing Plan, and 15.2 for the Proposed Plan. The decrease in VMT per capita is due to the additional land use densities expected with the reasonably expected changes in socioeconomic data (i.e., housing, population and employment growth) and the mobility improvements that are part of the enhanced network treatments. Additional density in the project area provides more opportunities for residents, workers and visitors to travel locally, resulting in shorter trips (or fewer total trips within mixed-use developments). These approaches to land use planning are consistent with the AQMP and 2016-2040 RTP/SCS. A No Project/Existing Plan would reasonably result in growth still occurring but in patterns and locations that do not meet SB 375, SCS, and the City's Framework Element policies. This could reasonably result in the same use of consumer products and natural gas as the Proposed Plan but greater impacts from vehicles. Based on this, the use of the No Project/Existing Plan would not provide "the public and decision makers … the most accurate information on projects practically possible." As such, the City rejects the use of the Existing Plan/No Project as the appropriate baseline.

Response 8-7

The comment states that using a future baseline is proper in some cases, as held by the California Supreme Court in *Neighbors for Smart Rail v. Exposition Metro Line Construction* (2013).

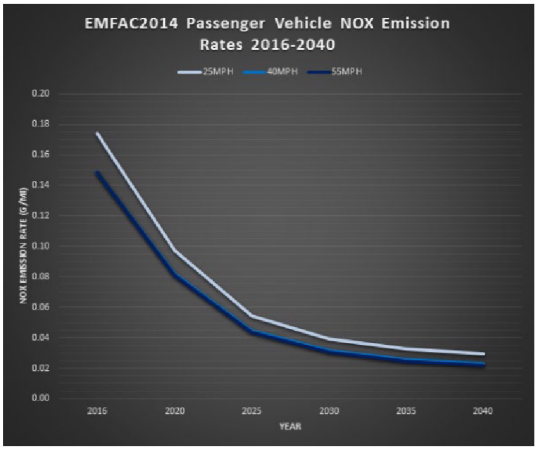
See **Response 8-6** for a detailed discussion of why using a future baseline is not required, as well as acknowledgment that the Future No Project/Existing Plan emissions were quantified and disclosed in Table 4.3-10 of the EIR and why the No Project/Existing Plan will not provide the "most accurate information on project impacts practically possible."

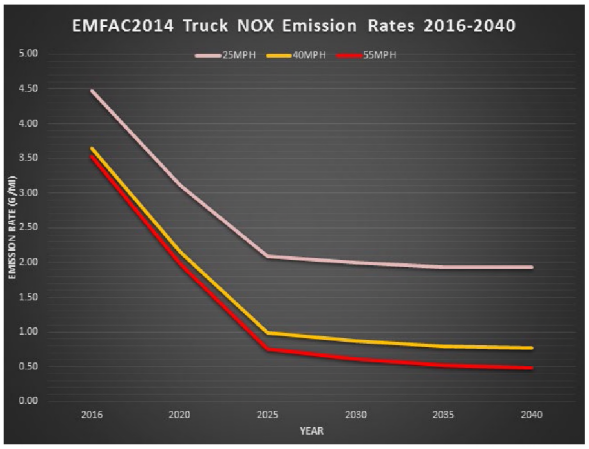
Responses 8-8

This comment reiterates the inaccurate claim that the Proposed Project takes credit for emissions reductions, and suggests that the EIR include interim year analyses in 2025, 2030, and 2035 comparing Proposed Plan emissions to the Future without Plan/Existing Plan, and that the EIR may have underestimated impacts attributable to implementation of the Proposed Plan. There is legal precedent for interim year analyses for certain types of land use development projects, including those with known increments of development (e.g., a Master Plan with an identified number of residences to be constructed in 5-year increments). However, for the Proposed Plan, the anticipated timing of land use changes and new development would be speculative and the EIR discloses reasonably expected development at the horizon of 2040. In general, economic activity tends to vary substantially over the short term with recessions and booms affecting short-term growth. Over the long-term planning horizon of the Proposed Plan, such variations tend to balance out. According to the 2010 U.S. Census, the population of the Hollywood Community Plan had decreased during the last great recession and growth was below SCAG projections. Similar short-term trends could occur

based on the COVID-19 crisis, and the uncertainty associated with projecting short-term growth would potentially create cascading inaccuracies. The City cannot reasonably anticipate if short-term growth would be linear or sporadic between 2016 and 2040; therefore, an estimation of incremental development is not practically possible and would not be consistent with the State Supreme Court ruling in *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310. Given the uncertainty in short-term growth, interim year emissions analyses are unlikely to be a reasonably accurate portrayal of emissions prior to 2040.

Furthermore, the comment is focused on mobile source emissions. Operational emissions estimates were produced using the preferred regulatory mobile source emissions model provided by the California Air Resources Board, EMFAC2014. The emission rates built into the software account for incremental implementation of emission controls and fleet turnover, with emission rates substantially decreasing by the year 2025. As an example, the following charts show passenger vehicle and truck emission rates by year for NO_X. The figures confirm the District's statement that the emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented, and fleets have not fully turned over. As shown in the charts, the emission rates sharply decline between 2016 and 2025 and then slowly decline between 2025 and 2040. For example, vehicle emissions for cars travelling 25 mph at current standards have a NO_X emission rate of approximately 0.174 grams per mile (g/mi) under current standards, which will decrease to 0.055 g/mi by 2025, a reduction of approximately 69 percent. Between 2025 and 2040, the EMFAC model projects the rate to decrease from 0.055 g/mi to 0.030 g/mi, representing only a about a 14 percent reduction relative to current standards and approximately one-fifth of the difference between 2016 and 2025. Given the relatively small change in emission rates between 2025 and 2040, it is not anticipated comparing Proposed Plan emissions to the Future without Plan/Existing Plan emissions in years 2025, 2030, or 2035 would result in significantly different emission estimates than presented in Table 4.3-10 for public disclosure of emissions. Based on the above, characterizing an interim year scenario would not provide the public with any more valuable information than what is already presented in the EIR.





Responses 8-9

The comment recommends that interim milestone years be identified and disclosed in the Final EIR. See **Response 8-8** for a comprehensive response related to interim milestone years.

Response 8-10

This comment suggests that due to the temporal longevity of the Proposed Plan, the EIR should disclose the combined construction and operational emissions and compare them to the SCAQMD mass daily thresholds for operations. The commenter states this is necessary under the general rule that in CEQA when specific

development is reasonably foreseeable, the Lead Agency should identify any potential air quality impacts and sources of air pollution that could occur. However, combining emissions that would be generated during construction activities and future operational conditions is not standard procedure when analyzing air quality impacts under CEQA. Nowhere in the District's *Handbook* is there an indication that this combination of emissions would be appropriate. Furthermore, the Air Quality Significance Thresholds for construction and operation were derived using different methods, and the *Handbook* explicitly recognizes that operations begin following the completion of construction activities. It is not practically possible to estimate the incremental increase in daily construction acreage, daily construction equipment activity, or daily construction truck trips throughout the entirety of the Hollywood CPA that would result from implementation of the Proposed Plan.

Specific development of individual projects is not practically possible as there is no comprehensive timeline on a project-by-project basis within the 13,962-acre CPA. The anticipated timing of land use changes and new development would be speculative as the EIR discloses reasonably expected development in 2040, following the completion of construction activities at the horizon of Proposed Plan implementation, consistent with SCAQMD guidance. The City cannot reasonably anticipate if growth would be linear or sporadic between 2016 and 2040. Given the uncertainty in year-to-year growth, interim year emissions analyses are unlikely to be even a reasonably accurate portrayal of emissions prior to 2040. The specific sequencing and schedule of construction of individual projects is speculative, as the Proposed Plan evaluates reasonably foreseeable development over a 24-year period. It would not serve the goal of providing an informational document to combine hypothetical construction projects with operational emissions in the future scenario. The combined emissions analysis, although not appropriate, would also present issues with feasibility and speculation as discussed further below. Without a comprehensive understanding of project details including the schedules under which individual projects would be constructed, this exercise would not bolster the disclosure of air quality impacts.

Also, the EIR includes a discussion of construction emissions for different sizes of projects (25, 50, 100 and 150 truck trips per day and 2, 4, 8 and 10 pieces of heavy-duty equipment on-site each day) that could be reasonably expected under implementation of the Proposed Plan. The EIR indicates that for projects with 100 or more truck trips per day emissions of NO_X would exceed SCAQMD regional emission thresholds (emissions of 110 lbs per day for 100 truck trips per day and 149 lbs per day for 150 truck trips per day). In addition, the EIR indicates that with 10 or more pieces of heavy-duty construction equipment emissions would exceed SCAQMD Localized Significance Thresholds (LSTs) for NOx, PM_{10} and $PM_{2.5}$ (86 lbs per day, > 4 lbs per day and > 3 lbs per day respectively). Thus, for projects using these levels of equipment, the EIR indicates that construction impacts would be significant (see EIR pages 4.3-21 through 4.3-23). Examples of EIRs prepared for projects within the Hollywood area that disclosed significant unmitigated construction air quality impacts include the Hollywood Center Project (City of Los Angeles, April 2020) and the Crossroads Hollywood Project (City of Los Angeles, May 2017). Those projects had maximum daily unmitigated construction NO_X emissions of 132 and 140 pounds per day, respectively, exceeding SCAQMD threshold. The equipment inventories in CalEEMod are populated based on project site size, and there is no demonstrable substantiation to suggest that the average daily area under construction within the Hollywood CPA would increase with implementation of the Proposed Plan, and projects constructed under the Proposed Plan would not be substantially different than those accommodated under the Existing Plan.

Furthermore, the District's *Handbook* explicitly states that, "[a]fter construction is completed, the project becomes operational." Based on this statement and the explanation for how the operational NO_X and VOC thresholds were derived, it is clear that the emissions generated by construction activities were not intended to be included in operational emissions, and that the best representation of operational emissions would be following the completion of construction activities associated with development under the Proposed Plan.

Additionally, in recent similar projects involving plan-level documents within the SCAQMD jurisdiction, construction emissions were not even quantified or disclosed (i.e., Santa Monica Downtown Community

Plan Draft EIR (2017), Pomona General Plan Update and Corridor Specific Plan (2013), SCAG 2016-2040 RTP/SCS Draft Program EIR (2016), SCAG 2020–2045 RTP/SCS (2020)), or were quantified but were not combined with operational emissions (i.e., South Glendale Community Plan Draft EIR (2017)). In addition, neither the West Adams and South/Southeast LA Community Plan EIRs combined emissions and a similar comment was not provided by the SCAQMD.

With respect to the analysis of construction impacts we also note the following:

1. Construction is happening under existing conditions and there is no evidence that construction will change/increase substantially over time; quantifying the incremental difference in daily construction activity (i.e., additional pieces of equipment operating or haul trucks on roads within the Hollywood CPA) under the Proposed Plan is not practically possible.

2. In addition, CalEEMod equipment inventories and activities for land use development projects are estimated based on the lot acreage of the project site; quantifying the incremental difference in acreage under construction on a given day within the Hollywood CPA is not practically possible.

3. The exercise of estimating existing and future daily construction activity for purposes of estimating changes in emissions is speculative and would involve evaluating the incremental increase in daily construction activity (i.e., site areas, specific inventories of equipment and haul trucks under existing conditions as well as with and without implementation of the Plan in the horizon year).

4. Construction emissions are a small fraction of total emissions. The 2008 RTP Program EIR calculated average construction emissions assuming that increased development and some redevelopment would be spread evenly over the 25-year planning horizon. The analysis did go on to on to speculate as to average project size, daily construction activity and earth movement for an average residential and non-residential project. That analysis indicated that construction emissions represented an average of about 0.95 percent of total calculated mobile source, and energy-related regional emissions. Thus, combining construction and operational emissions would not substantially alter the operational emissions and the fraction represented by construction would likely be within the error margin of the overall modeling.

5. For a typical construction fleet, emissions from construction today are greater than they will be in the future because of mandatory emission control programs implemented at the state level.

6. The District *Handbook* explicitly states that operational emissions begin following the completion of construction activities; and the operational emissions thresholds for VOC and NO_X were derived based on federal regulations for stationary sources.

7. It would be atypical to attempt to quantify the incremental increase in daily construction acreage, daily construction equipment activity, and daily construction truck trips that would result from implementation of the Proposed Plan relative to the Existing Plan in a specific year or relative to Existing Conditions.

8. For GHG emissions, the accepted methodology is to combine construction and operation emissions for individual projects and to amortize construction emissions over the anticipated lifetime of a project (typically 30 to 50 years). But that is not appropriate for criteria pollutants where impacts are much more directly correlated with impacts.

Based on all of the above, the EIR analysis as presented is reasonable.

Response 8-11

The comment indicates concern with the less than significant finding regarding the exposure of sensitive receptors to toxic air contaminants (TAC) during the operation of the Proposed Project and that the finding is not substantiated. The comment states that compliance with the City's Clean Up Green Up Ordinance and PRC Section 21151.8 is not sufficient to substantiate the finding. The City recently published guidance on

estimating the health risks associated with emissions from local plans (City of Los Angeles, October 2019). The City acknowledges that, "City EIR documents typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or project and a particular health effect. In addition, no expert agency has yet to approve a quantitative method to reliably and meaningfully do so. A number of factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature between air pollutants and health effects in conjunction with local environmental variables. Therefore, at this time, it is infeasible for City EIRs to directly link a plan's or project's significant air quality impacts with a specific health effect."

The comment omits additional language in the EIR that is used to substantiate the finding of less than significance for operational pollutant exposure. In Section 4.3, Air Quality, page 4.3-30 of the EIR, the analysis discusses that the Proposed Plan does not promote, and will not foreseeably result in, industrial land uses that would be expected to generate significant toxic air contaminant emissions. The EIR shows that in general operational emissions of criteria pollutants would decrease (Future Plan compared to Existing). Only VOC would increase, primarily, as indicated in the EIR, as a result of consumer product use; the analysis notes that consumer product use varies considerably by land use type. (We also note that the CalEEMod model used to calculate Plan emissions does not account for rapidly changing regulations that are anticipated to substantially reduce consumer product emissions over time.) The analysis of criteria pollutants indicates that mobile source emissions would all decrease. Therefore, there is no basis for undertaking a health risk assessment (HRA).

The comment asserts that the City should have completed an HRA with a quantitative analysis demonstrating how elements of the Proposed Plan and future projects will reduce health impacts to a less than significant level, particularly as it relates to residential exposure to diesel pollution generated by heavy-duty trucks on US-101. In the California Supreme Court *California Building Industry Association vs. Bay Area Air Quality Management District* (December 17, 2015), the Court held that "agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a proposed project could exacerbate those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions."

The Proposed Plan would not exacerbate diesel truck volumes or diesel pollution generated by heavy-duty trucks on US-101. As indicated in Chapter 3.0, Project Description, Table 3-10 on page 3-39 of the EIR the Proposed Plan would not be expected to increase land uses typically associated with diesel truck generation compared to today. (In fact, as compared to the Existing Plan, the Proposed Plan would reduce industrial land uses by eight acres (277 under the Plan compared to 269 acres under the Existing Plan). The industrial land in the Proposed Plan would not foreseeably redevelop in ways that would produce new diesel truck trips beyond those currently existing, nor is it anticipated that development under the Proposed Plan would bring diesel truck traffic in closer proximity to sensitive receptors. Industrial land in the Hollywood CPA is typically occupied by media and entertainment-related uses, such as studios, and supporting uses, such as storage. In recent years, development on industrial land has generally been associated with expansion of existing large studio properties, new creative office spaces, and new media uses. These uses would not be expected to produce additional diesel truck trips.

The SCAQMD has identified substantial truck trip generating land uses to include distribution centers, warehouses, and other industrial uses that serve as temporary or permanent destinations for commercial freight. The land use patterns within the Hollywood CPA would not accommodate a substantial source of diesel truck activity. In addition, the California Air Resources Board EMFAC model indicates that the diesel particulate matter emission rate for a heavy-duty truck traveling at 40 miles per hour (mph) was 0.205 grams per mile in the 2016 Existing Plan condition and will be 0.111 grams per mile in the 2040 Proposed Plan

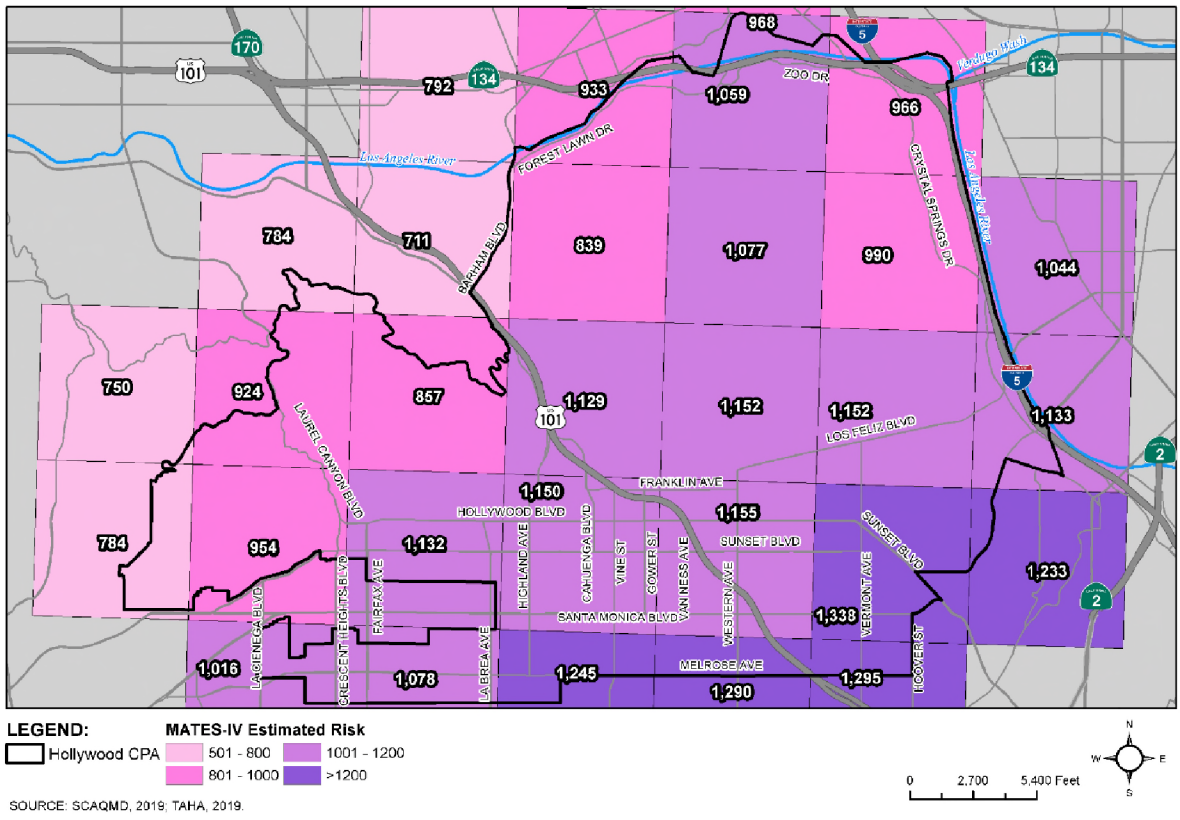
condition, a significant decline in the emission rate. It is not reasonably foreseeable that the Proposed Project would exacerbate the existing condition as it relates to diesel trucks on US-101.

As discussed in **Response 8-8**, any "floating baseline" short-term analysis from the Proposed Plan would be speculative. Based on all of the above, there is no basis to find the project will exacerbate existing conditions as they relate to diesel emissions on the US-101.

Assessing health risks from existing freeway emissions on the Proposed Plan is not required where the project does not exacerbate those conditions. As such, the conclusion in the EIR related to sensitive receptors is supported with substantial evidence and mitigation is not required to reduce the health risks resulting from diesel traffic on US-101 because the Proposed Plan would not result in a significant impact.

Notwithstanding that the Proposed Project does not exacerbate diesel emissions on US-101 and the EIR does not need to analyze health risks from exposure to diesel fumes from the US-101, the comment requests the disclosure of health risks near US-101 within the Hollywood CPA. The following information regarding health risks near US-101 is provided:

The SCAQMD Multiple Air Toxics Exposure Study IV estimates health risks throughout the South Coast Air Basin (Basin). MATES-IV includes an interactive map to identify the estimated modeled carcinogenic risk from air toxics by geographic location. The estimated health risk near US-101 is shown in the following image. The risk in the Hollywood CPA ranges from 750 to 1,338 persons in one million. For context, the highest carcinogenic risk of about 2,500 persons in one million was found near the Ports of Los Angeles and Long Beach. The existing ambient carcinogenic risk near central Los Angeles is slightly over 1,200 persons in one million. The 2016-2040 RTP/SCS also includes a robust discussion of pollutant exposure and health risk near freeways in the Air Basin. The RTP states that, "[w]hile the VMT would rise under the Plan, the maximum potential cancer risk is on the order of 50 to 90 percent less than existing conditions. This is due to the dramatic reduction in emissions that are expected due to the federal and state regulations that require reduced emissions from on-road heavy-duty diesel trucks (HDDT)."



In addition, the most recent RTP EIR (Connect SoCal Program EIR, certified May 13, 2020) includes an HRA for representative high-truck-volume freeway segments (the 110, 710 and 50 were evaluated in Los Angeles County) throughout the region, comparing cancer risks for 30-year residential exposure adjacent to freeways comparing 2019 conditions to 2045 conditions. While the 101 freeway was not a freeway selected for analysis, the conclusions of the Connect SoCal Program EIR with respect to health risk adjacent to freeways is relevant. The connect SoCal Program EIR concludes that (page 3.3-77 through 3.3-78), "[d]ue to the significant reduction in DPM emissions and associated health risk, overall risk is reduced and therefore, impacts are considered less than significant." (The maximum cancer risks for the four freeway segments in Los Angeles County were shown to be reduced by 51 percent to 73 percent compared to existing 2019 conditions as a result of expected federal and state regulations.)

Response 8-12

The comment offers several strategies to reduce exposure, including using filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better and landscaping screening.

Strategies, or mitigation measures, to reduce diesel particulate matter at residences near US-101 are not required because the EIR does not identify a related significant impact. Refer to **Response 8-11**. The SCAQMD recommendations for additional strategies have been provided to the decision-makers for consideration for including in the existing Ordinance.

Response 8-13

The comment recommends that the installation of enhanced filtration units a project design feature that will be required for later project-level development and to provide additional details in the Final EIR. The comment also recommends that disclosure and informational documents be provided to prospective residents.

Enhanced filtration units are not required as mitigation because the EIR does not identify a related significant impact. Refer to **Response 8-11**. The City of Los Angeles adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings. The SCAQMD recommendations for enhanced filtration have been provided to the decision-makers for consideration for including in the existing Ordinance.

Response 8-14

The comment recommends the consideration of additional mitigation measures to further reduce emissions and minimize significant air quality impacts. The recommended list of thirteen mitigation measures include building materials, maximizing the use of solar energy, requiring use of electric lawn mowers and leaf blowers, and using only Energy Star appliances. See below for more information.

DCP staff has reviewed the mitigation measures suggested by the SCAQMD.

The following mitigation measures have not been incorporated into the Final EIR. An explanation is provided for each measure.

- Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.
    - *Explanation*: This suggested mitigation measure is related to fugitive dust control. All construction projects located within the City are required to comply with SCAQMD Rule 403 (Fugitive Dust), which ensures comprehensive control of fugitive dust emissions in the Air Basin.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM_{10} generation.
    - *Explanation*: This suggested mitigation measure is related to fugitive dust control. All construction projects located within the City are required to comply with SCAQMD Rule 403 (Fugitive Dust), which ensures comprehensive control of fugitive dust emissions in the South Coast Air Basin. In addition, the City requires signs at construction sites that include a contact person with a phone number.
- Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
    - *Explanation*: This suggested mitigation measure is related to fugitive dust control. All construction projects located within the City are required to comply with SCAQMD Rule 403 (Fugitive Dust), which ensures comprehensive control of fugitive dust emissions in the Air Basin.
- Apply water three times daily or non-toxic soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed. Reclaimed water should be used. Limit parking supply and unbundle parking costs.
    - *Explanation*: The first part of this suggested mitigation measure is related to fugitive dust control. All construction projects located within the City are required to comply with SCAQMD Rule 403 (Fugitive Dust), which ensures comprehensive control of fugitive dust emissions in the Air Basin. The second part of this mitigation measure is related to parking costs. As this is located in between suggested measures for construction activities, it is not clear if the SCAQMD intended to include this measure in the comment letter. Regardless, the Proposed Plan includes a variety of policies and programs related to parking, including but not limited to the following:

Policy M.6.1: Efficient management. Improve utilization and management of existing public parking supply. Support their use and encourage shared parking, market-driven pricing, and other parking innovations to ensure parking efficiency.

Policy M.6.11: Maximize the use of on-street parking spaces in commercial areas.

Program 94: Work with LADOT to implement Express Park, an intelligent parking management system that provides information on the location and pricing of available parking in current time and adjusts pricing and time limit in response to changes in supply and demand.

- Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB) adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards. The Lead Agency should include this requirement in applicable bid documents, purchase orders, and contracts for individual development projects within the Hollywood Community Plan Area. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure and enforce compliance.
    - *Explanation*: This suggested mitigation measure would require a massive turnover of the private on-road haul truck vehicle fleet from older engines to new zero-emissions or near-zero emission trucks. These trucks are not currently readily available in Los Angeles County and not in the numbers that would support the intensity of construction activities in the Hollywood CPA and throughout the City, although this is expected to change with time. The City is not best situated to do rulemaking on best available control technology as an expert agency on air pollution control measures. The City finds it is infeasible as a policy matter to expend resources to regulate fleet emissions. Fleet emissions for vehicles that provide a regional service is best regulated by the CARB or the SCAQMD. For example, the SCAQMD already has rules that are relevant to certain vehicle fleets (e.g., Rule 1196 (Clean On-Road Heavy-Duty Public Fleet Vehicles) and the CARB has regulations applicable to truck emissions (e.g., Heavy-Duty (Tractor-Tractor) Greenhouse Gas Regulation).
    - Additionally, it is infeasible to create a fleet emission requirements for one community plan out of 35, and for one City not the entire air basin or economic region. It would be unreasonable from a policy perspective for the City to invest the necessary resources to develop a program mandating truck requirements within the Hollywood CPA, which would require expending significant funds for research and development and rulemaking activities. The City finds that expending these resources is not supported by standard practices under CEQA and that it would not be appropriate to divert funding when CARB and the District already maintain robust emission control strategies.
- Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles. Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx and ROG impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require individual development projects within the Hollywood Community Plan Area to provide the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

- *Explanation*: For new multi-family dwellings and "R" occupancies other than one- and two-family dwellings and townhouses, the City's Green Building Code requires that five percent of the total number of parking spaces required shall be electrical vehicle charging spaces (EV spaces) capable of supporting future EV, but in no case less than one space. Additionally, when only a single charging space is required, construction plans must include a listed raceway capable of accommodating a 208/240 volt dedicated branch circuit. The requirements are different when multiple EV charging spaces are required – the design shall be based upon 40 ampere minimum branch circuits. Please see Article 9 (Green Building Code) of the LAMC. CalGreen also contains extensive requirements for EV charging infrastructure. The City finds requiring any additional EV beyond the above is infeasible and will place undesirable costs on the provision of new necessary housing production.

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs throughout the Hollywood community Plan Area to generate solar energy for the facility.
  - *Explanation*: LADWP is responsible for power supply and compliance with SB 350 (Clean Energy and Pollution Reduction Act of 2015). The City has an aggressive goal for 100 percent renewable energy by 2045 that is independent of the Proposed Plan. For example, Los Angeles Mayor Eric Garcetti's plan to phase out three gas-fired power plants by 2029 is expected to accelerate the transition by the largest municipal utility in the nation to 100 percent renewable energy. Several policies in the Proposed Plan promote solar energy including:

    LU9.2: Encourage development to use clean, efficient, renewable materials and green building policies. Encourage discretionary and major projects to exceed Green Building Standards.

    LU9.3: Encourage flexibility in building designs in developments to use green building practices and incorporate solar, clean, or efficient energy.

    LU10.5: Encourage the joint use of public facilities for the purpose of promoting the efficient use of space, energy and public resources.

    LU10.6: Promote the use of clean, renewable energy that is diverse in technology and location to decrease dependence on fossil fuels, reduce emissions of greenhouse gases and increase reliability of power supply. Support the use of wind energy, hydropower, geothermal energy, biomass energy and solar power. Encourage passive and active solar energy systems, particularly photovoltaic.

In addition, the Los Angeles Green Building Code includes up-to-date solar requirements mandated by the State. The City finds this measure as infeasible as a policy matter to the extent it is inconsistent with other City plans and policies to reduce energy use and attain its renewable energy goals.

- Maximize the planting of trees in landscaping and parking lots.
  - *Explanation*: LAMC has tree planting and landscaping requirements, including shrubs and suitable groundcover, for parking lots; please see LAMC Section 12.21.A.6(g) through 12.21.A.6(i). There is also a citywide Landscape Ordinance (No. 170978). Therefore, this mitigation measure is not necessary.

- Use light colored paving and roofing materials.
  - *Explanation*: Alternative paving materials, such as porous asphalt, permeable pavers, and decomposed granite or crushed rock are generally permitted in parking areas; see LAMC Section 12.21.A.6.(c). The City has a cool roof ordinance as part of the Los Angeles Green Building Code; the ordinance does not mandate specific color palettes or materials but allows for flexibility as long as products are in line with the Cool Roofs Rating Council. For additional information, see Ordinance No. 183149. Therefore, this mitigation measure is not necessary.

- Require use of electric or alternatively fueled street-sweepers with HEPA filters.
    - *Explanation*: The total miles of streets would be the same in the Existing Condition, Future No Build/Existing Plan, and Proposed Plan. The Proposed Plan would not increase the total miles of streets in the Hollywood CPA and would not increase related pollutant emissions. In addition, street sweeping activities are managed by the City's Street Maintenance Division. According to the City's Street Maintenance Division website, the Bureau of Street Services is converting its fleet of sweepers into alternative fuel, Compressed Natural Gas (CNG) in an effort to reduce pollution and dependency on fossil fuels.[38]
- Require use of electric lawn mowers and leaf blowers.
    - *Explanation*: The Proposed Plan would not significantly increase acres of landscaping that would be maintained using lawn mowers and leaf blowers. As stated on page 4.14-51 of the EIR, "No new recreation facilities are planned or proposed in the Proposed Plan; however, the Los Angeles Recreation and Parks is currently seeking opportunities to expand parkland within the Project Area but has not yet identified specific parcels for acquisition of development." As shown in Table 4.10-1 on page 4.10-14 of the EIR, the 13,962 acres would be available for landscaping in the CPA. The same acreage is available in the Existing Condition and would be available in the Future No Project/Existing Plan. The urban CPA is built-out and there would not be a significant change in the acres of landscaping available for residential, commercial, and industrial land uses. The costs of acquisition of land and the feasibility of assembling parcels of land for recreational facilities are severe impediments to the provision of parks. It is not anticipated that the Proposed Plan would significantly change emissions from lawn mowers and leaf blowers.

In addition, it would not be equitable for the City to ban gas lawn mowers and leaf blowers in the Hollywood CPA and not in the other CPAs. DCP has forwarded the recommendation for a Citywide ban on lawn mowers and leaf blowers to the decision-makers for consideration. Importantly, Section 112.04 of the LAMC currently prohibits the operation of gas blowers when located within 500 feet of residents.

- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
    - *Explanation*: The City has a Green Building Code that incorporates Energy Star features into new construction. Refer to the Energy Efficiency subsection of Divisions 4 (Residential Mandatory Measures) and 5 (Nonresidential Mandatory Measures) of the Article 9 in the LAMC Green Building Code.
- Use of water-based or low VOC cleaning products.
    - *Explanation*: The regional availability of water-based and low VOC cleaning products should be regulated by the SCAQMD, similar to SCAQMD Rule 1113 for Architectural Coatings. Unlike the SCAQMD, the City does not have the expertise or resources to identify and enforce a ban on the VOC content of cleaning products. It would not be feasible or responsible for the City to expend resources for program development to the extent that the SCAQMD already does as the regulatory authority. The City finds such a measure therefore infeasible as a policy matter as it is undesirable to use City resources needed elsewhere to develop a rulemaking process requiring technical air pollution expertise and understanding of the industry. The City also finds it is infeasible to develop new rules on cleaning products at the community plan level.
- Since the Proposed Project would be implemented over a period of 20 years or more, the Lead Agency should take this opportunity to deploy strategies that will foster and facilitate the deployment of the lowest emission technologies possible. SCAQMD staff recommends that the Lead Agency develop performance standards-based technology review at a programmatic level that is generally appropriate for

[38] Bureau of Street Services, https://streetsla.lacity.org/street-maintenance-division, accessed June 5, 2019.

an area-wide and long-range plan such as the Proposed Project. The deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (California PRC Section 21061.1), such as zero and near-zero emission technologies that are expected to be available in the life of the Proposed Project. As such, SCAQMD staff recommends that the Lead Agency incorporate the performance standards-based technology review or develop other comparable strategies or tools to periodically assess equipment availability, equipment fleet mixtures, and best available emissions control devices. The Lead Agency should also specify performance standards and an appropriate timeline (or schedule) for the technology assessment, such as every two years, that supports the NOx emissions reductions goals and timeline as outlined in the 2016 AQMP. SCAQMD staff encourages the Lead Agency to involve the public and interested agencies such as the SCAQMD and the CARB in developing an appropriate process and performance standards for the technology review.

- *Explanation*: The comment is broad and does not make a specific recommendation applicable to the Proposed Plan. This measure is infeasible for the City based on resource limitations. Unlike the SCAQMD, the City does not have the expertise or resources to manage the equipment availability, equipment fleet mixtures, and best available emissions control devices. According to the SCAQMD website, "SCAQMD's Mission is to clean the air and protect the health of all residents in the South Coast Air District through practical and innovative strategies." Strategies to foster and facilitate the deployment of the lowest emission technologies possible is within the charge of, and best handled, by the SCAQMD, based on their statutory authorities, expertise, and resources. Furthermore, the City has committed to the 2019 *Sustainable City pLAn,* which commits to 55 percent renewable energy by 2025, 80 percent renewable energy by 2036, and 100 percent renewable energy by 2045 and all new buildings being carbon neutral by 2030 followed by 100 percent of buildings being net zero carbon by 2050. The City will focus resources on the expansion of renewable energy applications to green buildings, the expansion of alternative fueled vehicle infrastructure, and the advancement of energy efficiency programs.

Response 8-15

The comment states the Proposed Plan is a large operation of approximately 13,962 acres or 21.8 square miles and therefore subject to SCAQMD Rule 403(e) related to large operations. This is not a correct interpretation of Rule 403 requirements. Rule 403(e) is clearly written for specific land use development projects. This is evident from consulting SCAQMD Form 403N for Large Operation Notification. The form requires contractor/consultant/owner information, the name of the property owner, and construction start and end dates.

The Proposed Plan includes amending both the text and the land use map of the Hollywood Community Plan. The Plan would also adopt several zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood Community Plan Area to allow specific uses and changes to development standards (including height, floor area ratio, and density). The Proposed Plan does not include individual land use development projects that would result in identifiable land disturbance. Importantly, all projects developed in the CPA would be required to comply with SCAQMD Rules, including Rule 403(e). Individual projects would be legally required to obtain relevant permits and demonstrate compliance with SCAQMD Rules. Specific compliance cannot be demonstrated because specific projects are not reasonably foreseeable. Further, compliance with laws and mandates does not need to be demonstrated in the EIR or identified as mitigation measures.

LETTER NO. 9

Mark Vallianatos, Policy Director
Abundant Housing LA

Responses 9-1 and 9-2

The comment introduces Abundant Housing as a volunteer pro-housing organization, and summarizes its main housing concerns regarding the Hollywood Community Plan: an inadequate allowance of residential growth, density, and affordable housing, and concern about hotel development. The comment describes the Hollywood Community Plan Area as a jobs center that is relatively well served by transit, and diverse housing types and housing for residents with different income levels and stages of life are needed. The comment states that past development limitations on density have contributed to a housing and homelessness crisis, especially negatively affecting lower income residents.

As the comments speak generally about policy concerns, please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not identify any new physical environmental impacts, raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. **Responses 9-3** to **9-5** below address specific comments on the environmental analysis of the EIR.

Response 9-3

The comment states that the ban on apartments in transit areas is exclusionary and environmentally destructive because more people would live further from transit and drive. The comment also states that other cities are abandoning single-family zoning and the City of Los Angeles should do the same and allow a mix of single-family houses, duplexes, triples, fourplexes, and bungalow courts.

One of the primary objectives of the Proposed Plan is to accommodate foreseeable growth in the project area, consistent with state, regional, and city growth strategies, including the Framework Element, as stated in Chapter 3.0, Project Description, on page 3-13 and also discussed in the Section 4.10, Land Use and Planning, of the EIR, on pages 4.10-17 to 4.10-24. Additional residential development potential is planned around existing transit hubs and corridors to encourage sustainable land use while minimizing adverse environmental impacts. The Proposed Plan includes floor area ratio and density incentives for the provision of affordable housing in selected areas near transit systems; see the Proposed CPIO (Final EIR Updated **Appendix E)** for more information. In addition, accessory dwelling units (ADUs) and junior accessory dwelling units are allowed on lots with single-family zoning, with additional restrictions specified for hillside communities. Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Response 9-4

The comment states parking requirements have historically created pollution, dangerous streets, and traffic. The comment further states it is inappropriate to take up space for parking in the Plan Area when there are homelessness and high housing costs.

The Proposed Plan includes policies to encourage and promote a variety of mobility options in Chapter 6: Mobility and Connectivity. Under the Proposed Plan, additional mixed-use development potential around transit corridors offers residents, employees, and visitors mobility choices that enable them to reduce the number and length of vehicle trips. The Hollywood CPIO's affordable housing incentives eliminate or reduce residential parking requirements, and can reduce non-residential parking requirements, with the provision of affordable housing at specified percentages within the subareas of the CPIO. Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Response 9-5

The comment provides nine recommendations that would allow for more housing and affordable housing development in the Plan Area within a half mile to one mile of transit and rail stops, including the following: allowing four residential units on all parcels, removing density limitations, eliminating/reducing parking requirements, and requiring replacement units to be affordable or moderate income. The comment also states that the Proposed Plan's density bonus incentives should be consistent with transit-oriented community incentives, not include incentives for hotels or commercial uses, and not prohibit 100 percent residential buildings in selected areas of the CPA. In addition, the comment suggests creating implementation programs to study how transit-oriented communities reduce greenhouse gas emissions, and to identify publicly owned parcels for supportive, affordable, or mixed-income housing.

The Hollywood CPIO does not provide any incentives for hotels. Incentives are provided under the CPIO for the provision of affordable housing on project sites at specified percentages and levels, as well as incentives for the provision of publicly accessible open space for non-residential projects in a specified area generally located near the Hollywood and Vine Metro B (Red) Line station. Please also refer to **Responses 9-3** and **9-4**.

LETTER NO. 10

Alliance for Community Transit - Los Angeles (ACT-LA)
Thai Community Development Center

Response 10-1

The comment contains introductory text and provides background information about the Alliance for Community Transit – Los Angeles (ACT-LA) and the Thai Community Development Center (Thai CDC). The responses below address ACT-LA and Thai CDC's specific comments on the Proposed Plan and the environmental analysis in the EIR.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 10-2

The comment provides further introduction to the commenters' primary concerns which they summarize by stating that the EIR lacks proper analysis of environmental impacts that would result from implementing the Proposed Plan and fails to provide appropriate mitigation measures for these impacts.

The comment states a general opinion that does not identify specific issues, impacts or mitigation measures. Without further specification with respect to inadequacies in the analyses, no further response is required. For clarification, Mitigation Measures are listed in a summary table in Chapter 2.0, Summary, of the EIR, including a Subsection 2.3, Classification of Environmental Impacts, on pages 2-4 to 2-5. For discussion related to displacement of affordable housing and lower-income residents please see **Master Response No. 6 – Displacement and Affordable Housing**. **Responses 10-3** to **10-9** below provide additional response to specific concerns.

Response 10-3

The comment expresses concern that implementation of the Plan would encourage new market rate development which would in turn affect the housing affordability in the CPA and result in indirect displdacement of low-income households. The comment also states that these displacements could cause impacts on air quality, GHG emissions and other significant environmental and social impacts.

Please see **Master Response No. 6 – Displacement and Affordable Housing**.

Response 10-4

The comment states that the EIR does not analyze the Plan's compliance with Measure JJJ.

The comprehensive assessment of the Proposed Plan in terms of Measure JJJ is discussed in the CPC Staff Report for Case No. CPC-2016-1450-CPU. The key provisions of Measure JJJ are summarized on page 4.13-8 of the EIR as well as the TOC Guidelines as a result of Measure JJJ; these two are described under the local regulatory framework of Section 4.13, Population, Housing, and Employment. As discussed in the CPC Staff Report on pages A-28 to A-32, the Plan does not reduce the capacity and preservation of affordable housing and access to local jobs and does not undermine California Government Code Section 65915 or any other affordable housing incentive program. As discussed, the Proposed Plan has a number of policies and zoning actions that support the preservation and creation of affordable housing. The policy document has goals and policies, including ones that support affordable housing near transit, the preservation of rent stabilized units, and local employment; see the Chapter 3: Land Use & Urban Form of the Community Plan (Updated **Appendix D)** for the specific text. Under the Proposed Plan, about 95 percent of the land designated or zoned for residential use is not proposed to change; the difference is largely due to the conversion of more than 300 acres of single-family residential use in the hillsides for the purpose of open space conservation. The Hollywood CPIO District incentivizes opportunities for housing and affordable housing in commercial and multi-family residential areas near transit stations and bus lines. To preserve existing affordable housing units and older residential stock, the base residential densities in multi-family residential areas are being maintained; density is increased if affordable housing is provided on site through the CPIO. The CPIO offers density bonuses and additional floor area when required levels and percentages of affordable housing are built. The State Density Bonus program is an option that will continue to be available, and the affordable housing incentives in the CPIO meet or exceed the ones provided in California Government Code Section 65915.

The EIR is not required to specifically discuss compliance with every single local, state, and federal regulatory law, regulation or plan. The EIR is required to identify any conflicts with ordinances, policies or plans that was adopted for the purpose of avoiding or mitigating an environmental impact. Measure JJJ was not adopted for the purpose of avoiding an environmental impact. Measure JJJ is regulatory for development projects that seek certain entitlements. The TOC affordable housing program is an optional incentive program. Both Measure JJJ and the TOC Guidelines may lead to construction of new development projects that have affordable and market rate units. The two relevant impacts, Impacts 4.13-2 and 4.13-3, discuss whether the Proposed Plan would displace substantial number of existing people and housing, necessitating the construction of replacement housing elsewhere. The conclusion for both was less than significant, as discussed on pages 4.13-18 to 4.13-21.

This comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 10-5

The comment states that the EIR does not adequately analyze environmental impacts associated with displacement because the EIR does not include an analysis of the Plan's effect on affordability of existing housing. The comment continues by stating, alterations to the affordability of housing in the CPA in combination with new development that may displace existing housing may lead to environmental impacts that should be discussed in the EIR.

Please see **Master Response No. 6 – Displacement and Affordable Housing**.

Response 10-6

The comment states that changes in housing affordability would result in direct and indirect displacement of low-income residents, which would result in an increase in VMT and other environmental impacts such as increases in GHG and other air emissions.

Please see **Master Response No. 6 – Displacement and Affordable Housing**.

Response 10-7

The comment states that the EIR lacks measures to mitigate displacement of small businesses that serve and employ low-income residents and requests that the EIR analyze these effects and to create measures to stabilize and support local small businesses.

The comment raises a social and economic impact and does not identify any new physical environmental impacts or raise any new significant environmental issues. Additional policies addressing this topic have been added to the Community Plan; see Final EIR Updated **Appendix D**, Draft Community Plan. See Chapter 3 Land Use & Urban Form. Some are listed below:

- Goal LU6: Neighborhoods with local serving businesses that provide employment opportunities, community services, and amenities, and sustain unique scale, block patterns, and cultural design elements.
- Policy LU6.9: **Neighborhood retail**. Protect small, neighborhood-serving retail in residential districts with high pedestrian activity.
- Policy LU6.10: **Small business retail space**. Encourage mixed-use and commercial developments to provide retail spaces conducive to community-serving small businesses and business incubation.
- Policy LU6.11: **Support neighborhood establishments**. Support existing neighborhood stores (i.e., mom-and-pop establishments) that support the needs of local residents, are compatible with the neighborhood and create a stable economic environment.
- Policy LU6.12: **Local employment**. Ensure that neighborhoods are well connected to adjacent employment areas that provide services, amenities, and employment opportunities to the local community.
- Policy LU9.7: **Local jobs**. Maintain and increase the commercial employment base for community residents, including those facing barriers to employment, through local hiring, living wage provisions, job resource centers and job training.
- Policy LU9.8: **Minimize displacement of small businesses**. Encourage the retention of existing small businesses that strengthen the local economic base of the Community Plan Area.

Please see **Master Response No. 6 – Displacement and Affordable Housing**.

Response 10-8

The comment states that the EIR should address how GHG emissions will impact environmental justice communities and identify mitigation measures that focus on environmental justice.

CEQA does not require an environmental justice analysis or mitigation measures to be developed based on social or economic concerns. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** for discussion of CEQA requirements.

Response 10-9

The comment states that the EIR should evaluate changes in transit ridership resulting from Plan implementation because, "if higher-income residents replace low-income residents near public transit, public transit ridership could decrease."

The Proposed Plan focuses future growth near transit rather than distributed throughout the CPA (including in residential neighborhoods and other areas not well-served by transit). This focused approach is consistent with smart growth principles, regional growth policies, and SCAG's 2016-2040 RTP/SCS, which call for increased density at transit centers in order to improve access to transit and enhance public transit ridership. Therefore, the Proposed Plan promotes multi-modal means of transportation and increased public transit ridership; further analysis of potential changes to transit ridership is not required by CEQA. Traffic forecasts in the EIR were generated using the SCAG Regional Transportation Plan traffic model which accounts for changes in transit trips due to geographic changes in population and employment, which is reflected in the VMT analysis, which considers reduced vehicle use in relation to increased transit ridership. The comment has not provided substantial evidence that supports the commenter's argument that the City's methodology for assessing impacts lacks substantial evidence or is otherwise unreasonable.

LETTER NO. 11

American Musical and Dramatic Academy (AMDA) College and Conservatory of the Performing Arts
6305 Yucca Street
Los Angeles, CA 90028

Response 11-1

The comment contains introductory text and provides background information about AMDA. The comment states that AMDA supports the Proposed Project and the analysis in the EIR.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 11-2

The commenter expresses their opinion that the Proposed Plan is important to accommodate population growth and that the EIR accurately describes the CPA and the environmental impacts of the Proposed Plan. The comment identifies the Proposed Plan's goals that AMDA supports: increasing density around transit systems and corridors, promoting a walkable neighborhood that is safe for all residents, and adding to the supply of housing. The comment also urges the City to expedite approval of the Proposed Plan.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 12

Robin Greenberg, President
Nickie Miner, Vice President
Bel Air-Beverly Crest Neighborhood Council
PO Box 252007
Los Angeles, CA 90025

Response 12-1

The comment introduces the Bel Air-Beverly Crest Neighborhood Council and its concerns regarding how the pace of hillside development is degrading the hillsides as a community resource. The comment also summarizes concerns related to hillside issues: ingress and egress challenges, emergency evacuation and access, the need to promote long-term habitation, preservation of environmental resources, and infrastructure upgrades.

Responses 12-2 to **12-15** below provide additional response to specific concerns on the Proposed Plan and the environmental analysis in the EIR.

Responses 12-2 and 12-3

The comment requests additional policy changes to the Proposed Plan but does not raise issues with the EIR. Specifically, the comment requests limiting the size of new houses built in the hillsides to discourage out-of-scale development and suggests that the size could be determined in relation to nearby development. The comment discusses zoning variances in the hillsides and suggests that development on private streets should follow zoning rules or be required to seek a Zoning Administrator's Determination.

Ordinance 184802, adopted in 2017, limits the maximum Residential Floor Area in the hillsides relative to the specific single-family hillside zone and the specific associated slope band. Zoning Administrator Adjustments, variances and other procedures are addressed in LAMC Sections 12.27 and 12.28. Changes to the visual character of the Hollywood CPA under the Proposed Plan would be less than significant; see pages 4.1-32 to 4.1-40 of the EIR. As described on pages 4.1-13 and 4.1-14, the existing developed land in the northwest region of Hollywood primarily consists of single-family residences on large lots, generally one and two stories, but some residences are three-story and four-story houses built into the hillsides. There are also a few public facilities and commercial buildings. In the northeast region, the developed portions include low-density hillside homes, generally one to two stories; some multi-family residential buildings that are generally several stories tall; and a few public facilities. The Proposed Plan is maintaining existing land use designations, zoning, and development regulations in hillside areas, including but not limited to the Hollywoodland and Mulholland Scenic Parkway Specific Plans, located in the northwest and northeast regions. Therefore, the overall development pattern including the density and intensity in these hillside areas is consistent with the existing developed portions and will not be caused by or result from the Proposed Plan. In addition, many hillside portions are either currently subject to or would be subject to the Site Plan Review threshold under the HCR district. While the Proposed Plan is not changing any land use or zoning capacity in the hillsides, it is expanding protections by expanding hillside areas on both sides of the US-101 Freeway that would be subject to the HCR. Please see **Master Response No. 9 – Hillsides**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 12-4

The comment requests additional policy changes to the Proposed Plan but does not raise issues with the Draft EIR. Specifically, the comment states that the Proposed Plan should identify specific open space resources including privately held land in an effort to preserve existing open space within the CPA. The comment also states that the Proposed Plan should include policies directed toward preserving open space that is privately held rather than allowing further development on such lands.

Table 3-10 in Chapter 3.0, Project Description, of the EIR shows that approximately 5,400 acres of open space are within the CPA accounting for approximately 39 percent of the total acreage. In addition, Figure 3-5 in the Project Description displays all existing and proposed open space within the CPA under the Proposed Plan including applicable private land that has the Open Space General Plan land use designation. Also, all policies related to Goal PR.3 New and improved open space and public parks that provide opportunities for recreation and gathering, starting on page 4-9 in Chapter 4: Public Realm, Parks, and Open Space of the Community Plan are geared toward preserving open space within the CPA. Also, see Goals PR.5 and PR.6 and their associated policies in Final EIR Updated **Appendix D** – Draft Community Plan; a selection is provided below for information.

- PR3.10: **Access to open space**. Maintain and improve access to existing open space and new open space including walking, hiking, and equestrian trails. Maintain and improve bicycle access to open space. Support the connection of existing walking, hiking and equestrian trail segments in the Plan Area, including the Rim of the Valley trails corridor, where feasible.
- Goal PR.5: Improved access to recreation facilities and open space.
- PR5.6: **Greenways and trail systems**. Preserve and encourage acquisition, development and funding of new recreational facilities and park space with the goal of creating greenways and trail systems.
- Goal PR.6: Protect existing natural areas and wildlife habitat.
- PR6.2: **Conservation**. Preserve passive and visual open space that provides wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas, and other natural resources areas.

The Proposed Plan is redesignating more than 300 acres of land in the hillsides to Open Space (OS), some of which is owned by the City, the SMMC, and the Laurel Canyon Land Trust. The General Plan Land Use Map footnote (Administrative Note No. 3) supports the redesignation of vacant land for the purpose of conservation to Open Space (OS) as appropriate: The Open Space (OS) land use designation is premised on the ownership and use of the property by a government agency, nonprofit or conservation land trust for the primary purposes of public recreation use or open space conservation. The designation of the Open Space (OS) zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency, nonprofit or conservation land trust officially determines that vacant land under their ownership is to be used as open space, the property may be redesignated and/or rezoned to Open Space (OS).

Regarding protecting open space on privately held land, privately held land that is designated Open Space (OS) land use designation shall remain so under the Proposed Plan. Undeveloped private land that has an underlying land use designation that would allow development cannot be restricted further beyond the zoning and municipal code restrictions already placed on these lands.

The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 12-5

The comment identifies the environmental benefits of open space (i.e., carbon sequestration, aquifer recharge, etc.) stating these benefits would be lost without open space preservation.

As discussed on page 4.10-15 of the EIR, the Proposed Plan preserves open space areas as primarily undeveloped open space and parks/recreation uses. The comment does not provide substantial evidence that any of the stated benefits of open space areas would be lost as a result of the Proposed Plan and thus no further response is required. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 12-6

The comment states that zoning incentives should be made available to encourage the conversion of privately-held open space to public open space and to rezone privately-held land as open space for preservation if the purchase of the land was for the purpose of open space preservation.

The Proposed Plan includes land use and zoning consistency changes, including open space parcels in Griffith Park and areas owned by the SMMC for open space preservation (identified as Subareas 101 through 104) and the Laurel Canyon Land Trust (identified as Subareas 106 through 110). The General Plan Land Use Map footnote (Administrative Note No. 3) of the Hollywood Community Plan supports the redesignation of vacant land for the purpose of conservation to Open Space (OS) as appropriate:

The Open Space (OS) land use designation is premised on the ownership and use of the property by a government agency, nonprofit or conservation land trust for the primary purposes of public recreation use or open space conservation. The designation of the Open Space (OS) zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency, nonprofit or conservation land trust officially determines that vacant land under their ownership is to be used as open space, the property may be redesignated and/or rezoned to Open Space (OS).

Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 12-7

The comment is making a policy suggestion that environmental analysis for development projects seeking entitlements should be required to account for all habitat loss regardless of protection of specific species and the Plan should maintain tree canopies.

Individual projects in the Hollywood Community Plan Area will continue to be required to undertake project-specific analysis of projects with the potential to significantly impact biological resources, including projects with the potential to result in a considerable contribution towards a significant cumulative impact. Mitigation measures will continue to be required for projects with the potential to result in significant impacts. In addition, as described under the regulatory framework of the Section 4.4, Biological Resources, of the EIR, there are federal, state and local regulations addressing required preservation of biological resources, in particular species and habitats identified as threatened, endangered, or otherwise sensitive. As stated on pages 4.4-4 and 4.4-5 of the EIR, the City of Los Angeles has a tree preservation ordinance for protected trees (Ordinance No. 177404) that applies to protected trees that are located on public and private properties. In 2021, the Mexican Elderberry and the Toyon were added to the list of protected trees under Ordinance 186873, which also has updated regulations. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 12-8

The comment states that the Plan should recognize and protect wildlife corridors including policies that restrict development within recognized wildlife corridors.

Please see **Master Response No. 7 – Biological Resources** which details existing wildlife corridors in the CPA and existing and proposed protections related to these resources.

Response 12-9

The comment states that some collector and smaller streets in the hillsides have become heavily travelled and requests policies, with follow up actions, to discourage collector street shortcuts.

The purpose of the EIR is to identify the potentially significant impacts of the Proposed Plan on the environment, rather than how existing development is affecting the environment. Chapter 6 in the Draft Community Plan addresses mobility and connectivity, and includes policies to calm traffic in residential neighborhoods, including hillsides. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Responses 12-10 and 12-11

The comment requests additional policy changes to the Proposed Plan but does not raise issues with the Draft EIR. Specifically, the commenter states that every hillside development should be subject to an infrastructure improvement fee proportionate to the scale of the property being built. The comment states that the Hillside Construction Regulation needs to be updated to address specific construction impacts in the Hollywood Hills. The comment requests that the entire Hollywood hillside should be a Hillside Construction Regulation (HCR) area.

As indicated in the regulatory framework, page 4.10-8 in Section 4.10, Land Use and Planning, of the EIR, in 2017 the City established HCR Supplemental Use Districts to provide additional protections to address the cumulative construction related impacts of multiple single-family houses in hillside areas. New single-family developments in HCR districts are required to comply with grading limits, hauling truck operation standards, and specific operating hours for construction activity. The EIR describes that there are currently two districts in the western part of the Hollywood Community Plan Area - the Bel Air Beverly Crest neighborhood and the Bird Streets and Laurel Canyon neighborhood. The Proposed Plan is establishing a new HCR district covering additional hillside communities on both sides of the US-101 Freeway in Hollywood and has a future implementation program (P146) to further consider amendments related to HCR districts. Please refer to the CPC-2016-1450-CPU Staff Report and Exhibits for more information. Other than impacts to existing parks, the EIR does not identify significant impacts to infrastructure. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 12-12

The comment states that construction activities in the hillsides present challenges for emergency vehicles attempting to access the hillside areas in the event of an emergency. The comment calls for limitations to be placed on construction permits issued in the hillside areas to limit the potential for safety issues. The comment also calls for the designation of hazard areas that place additional conditions on developments in hillside areas to ensure emergency vehicle ingress and egress.

Ordinance No. 184827 established the HCR Supplemental Use District, which restricts truck sizes and trips for hauling operations within the HCR Supplemental Use District. HCRs are established in parts of the hillside portions of the CPA. The Proposed Plan is creating an additional HCR district to cover additional hillside communities on both sides of the US-101 Freeway; please refer to the CPC-2016-1450-CPU Staff Report and Exhibits for more information about the HCR.

Response 12-13

The comment requests funding for an Office of Hillside Construction Coordination to coordinate roadway access and emergency access during construction.

Refer to Responses **12-10** and **12-11**.

Response 12-14

The comment states that there should be a maximum vehicle size limitation on substandard streets because large trucks damage roads and private property.

Refer to **Response 12-12**.

Response 12-15

The comment states that sounds in the hills can impact a greater number of neighbors than the same sound in the flats and requests a hillside-specific noise ordinance in the Proposed Plan. The comment does not raise concerns with the EIR noise analysis.

The comment does not clearly state what potential impact from the Proposed Plan would be mitigated by a hillside-specific noise ordinance, or what is suggested to be included in a hillside-specific noise ordinance. As stated on page 3-14 of the EIR, growth is directed away from hillside areas and lower-density neighborhoods and primarily into the Regional Center, the entertainment and visitor-serving center of the Project Area, and other commercial corridors served by transit. As development would be concentrated in these areas it would not be useful to develop noise mitigation for the hillside areas as it is most effective to mitigate noise at or near the source. It is possible that noise (sound waves) can amplify as noise travels, and as discussed in the EIR impact analysis section pages 4.12-16 to 4.12-27, and Cumulative Impacts section starting on page 4.12-2. However, the Proposed Plan is not amending any existing land use designations, zoning, and development regulations in hillside areas, except for administrative corrections. Therefore, the overall development pattern including the density and intensity in these hillside areas will not be caused by or result from the Proposed Plan. As such, the Proposed Plan would not change existing sources of noise in the hillsides and implementation of the Plan would not result in new impacts in the hillsides. Also see **Response 27-8** for a discussion on hillside echo sound and **Master Response No.9 – Hillsides**.

LETTER NO. 13

David Gajda
Hollywood Media Center LLC
PO Box 1430
Los Angeles, CA 90078

Response 13-1

The comment introduces the Cahuenga Corridor Coalition and the EACA Alley Property Owners Association, and states that the comment cards submitted at the NOP outreach meeting were not included in Appendix A, Notice of Preparation and NOP Comments.

The comment cards referred by the commenter were submitted at one of the Hollywood Community Plan Update's community outreach meetings in 2017 and are included in the Hollywood Community Plan Update case file (CPC-2016-1450-CPU). The comment indicates that comment cards were submitted at the NOP meeting, which was held on May 17, 2016. The sign-in sheet from the May 17, 2016 scoping meeting does not indicate that the commenter signed in, but the commenter did sign in at the July 8, 2017 outreach meeting held at the Los Feliz Library. From the July 8, 2017 meeting comments received, there was a handwritten note requesting a 75-foot height limit for Subarea 4:2B instead of the proposed 36 feet; no name was written on the note. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Responses 13-2 and 13-3

The comment states that the proposed zoning of Subarea 4:2C on Cahuenga Boulevard between Selma Avenue and Hollywood Boulevard should be changed to be consistent with new projects already completed or under development in this area. The comment states that there is a noticeable turnover of small establishments and a low FAR prevents properties from being able to consolidate for development. The commenter attached two sheets from a 2009 CRA historic survey to note that the property at 1612 North Cahuenga Boulevard is not a historical resource (Exhibit A) nor is the property located at 1600 North Cahuenga Boulevard (Exhibit B) are not historic. The comment states that the buildings in this area are mostly nondescript and have not been updated or graded, and provided an example of an order to comply with mandatory earthquake hazard reduction standards in existing non-ductile concrete buildings (Exhibit C) for the property at 1600 North Cahuenga Boulevard.

The status code listed for 1612 North Cahuenga Boulevard and 1600 North Cahuenga Boulevard is 6Z, which means they have been found ineligible for national, state or local designation through survey evaluation. The City's Zone Information and Map Access System (ZIMAS) states that these two properties are not subject to historic preservation review. The 2020 Hollywood Redevelopment Project Area historic resources survey concluded that this area on both sides of Cahuenga Boulevard north of Sunset Boulevard to just south of Hollywood Boulevard does not meet eligibility standards for designation because most contributing features have been altered but may be a planning district because the properties have thematic features in common. The proposed zoning of Subarea 4:2C has been modified from [Q]C4-2D-CPIO to C2-2D-CPIO. Please refer to the CPC-2016-1450-CPU Staff Report and Exhibits.

LETTER NO. 14

David Gajda
Hollywood Media Center LLC
PO Box 1430
Los Angeles, CA 90078

Response 14-1

The comment introduces the Cahuenga Corridor Coalition and the EACA Alley Property Owners Association, and states that the comment cards submitted at the NOP outreach meeting were not included in Appendix A, of Notice of Preparation and NOP Comments.

The comment cards referred by the commenter were submitted at one of the Hollywood Community Plan Update's community outreach meetings in 2017, which are included in the Hollywood Community Plan Update case file (CPC-2016-1450-CPU). The comment indicates that comment cards were submitted at the NOP meeting, which was held on May 17, 2016. The sign-in sheet from the May 17, 2016 scoping meeting does not indicate that the commenter signed in, but the commenter did sign in at the July 8, 2017 outreach meeting held at the Los Feliz Library. From the July 8, 2017 meeting comments received, there was a handwritten note stating that 1534 McCadden and 1540 McCadden should be included in Subarea 4:1B; no name was written on the note.

Response 14-2

The comment expresses concern that the two properties located at 1534 and 1540 North McCadden Place were not included in any proposed zone changes but other surrounding properties were included.

Although no response is required as it does not raise any issues related to physical environmental impacts, the following is provided for clarification: the two subject properties on McCadden are included in proposed Subarea 4:1B. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

LETTER NO. 15

Jorge Castaneda
Preserve LA
6500 Sunset Boulevard
Los Angeles, CA 90028

Response 15-1

Without identifying specifics, the commenter states generally that the EIR lacks sufficient analysis, demonstration, and quantification in regard to several environmental topic areas. The commenter believes the EIR does not contain sufficient detailed information about the Proposed Plan's environmental effects, sufficient ways to minimize the Proposed Plan's significant environmental effects, and reasonable alternatives to the Proposed Plan.

Responses 15-2 to **15-14** below provide additional response to specific concerns on the Proposed Project and the environmental analysis in the EIR.

Response 15-2

The comment states that the 2016 baseline conditions established for analysis in the EIR is flawed because, the comment claims, the housing data used to develop population and housing projections in the EIR is flawed and inaccurate. The comment cites a publication prepared by the Hollywood Chamber of Commerce as part of an original report which shows higher numbers of multi-family units built between 2010 and 2016 than what is reported in the EIR.

City Planning did not locate this report among the Hollywood Chamber of Commerce's publications available online. The Chamber published a Market Report in late 2018, which did not include statistics about housing construction but about business, retail, and entertainment trends in Hollywood based on interviews with persons who lived, worked, or visited the area in the spring of 2018. The estimated number of housing units in the CPA in 2016 were based on SCAG and/or ACS data estimates. Please see Appendix B, Methodology, regarding baseline data sources and also **Master Response No. 2 - Population, Housing and Employment**.

Response 15-3

This comment questions where the analysis of wastewater is in the EIR and states that the Crossroads of the World Project on Sunset Boulevard in the Hollywood CPA resulted in significant impacts related to wastewater, implying that if one project results in a significant impact related to wastewater, the Proposed Plan should also result in a significant impact related to wastewater.

Contrary to the comment, the EIR prepared for the Crossroads Hollywood Project determined that impacts related to wastewater would be less than significant. Please see **Master Response No. 4 – Infrastructure** discussing Crossroads and EIR analysis of wastewater.

Response 15-4

The comment states the EIR fails to disclose potential seismic impacts of the Proposed Plan citing a 2017 paper in Seismological Research Letters (not attached) which appears to discuss seismic impacts related to fracking operations. The comment partially restates the EIR analysis on page 4.6-15 and claims the thresholds of significance is unscientific and lacking integrity. The comment also states that the EIR does not disclose at least one dozen health and safety issues within 15 miles of the CPA, which includes "the Alquist-Priolo Earthquake Fault." The comment states these issues have occurred at oil and gas fracking sites.

The EIR states that the type of development expected to occur under the Proposed Plan is typical of urban environments and would not involve mining operations, deep excavation into the Earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust that would result in the rupture of a fault.

Fracking, a method of mining or petroleum extraction, is not a development considered under the Proposed Plan nor are fracking operations occurring within the CPA currently. Any seismic risks associated with the CPA, are existing risks presented by the plate tectonics underlying the CPA and the region. The EIR explains that the Proposed Plan does not contemplate any development that would affect this existing condition on page 4.6-15. Regarding the EIR's disclosure of Alquist-Priolo Fault risks, page 4.6-5 lists 21 different active faults in Southern California which may affect the CPA through associated seismic activity. The EIR also identifies the Hollywood fault including its geographic extent within the CPA and identifies the fault zone as an Alquist-Priolo Earthquake Fault Zone.

A series of seismic investigations aimed at locating near-surface traces of the Hollywood Fault were conducted by the U.S. Geological Survey (USGS) in May and June 2018. This study is added as **Appendix O** of this EIR (see also **Chapter 4.0, Corrections and Additions**, for page 4.6-5). Evidence exists for a near-surface trace of the Hollywood Fault slightly south of Carlos Avenue between North Bronson and North Gower Avenues. Farther west, along Argyle Avenue, the data also indicates near-surface faulting slightly south of the intersection of Carlos and Argyle Avenues and between Carlos Avenue and Yucca Street. As discussed under Impact 4.6-1 on page 4.16-16 of the EIR, the Proposed Plan would not cause or accelerate existing geologic hazards. Future development under the Proposed Plan would not exacerbate the rupture of the Hollywood Fault or any other fault in the Project Area, including these newly identified trace faults.

The comment regarding the health and safety issues does not identify any such issues and does not present substantial evidence that the Proposed Plan would result in impacts to existing seismic conditions such that future residents in the CPA would be affected by exacerbated conditions.

Response 15-5

The comment states that the EIR fails to provide a range of alternatives that account for population decline, suggesting that a preponderance of studio and one-bedroom single family units built in the CPA is not conducive to population growth through births. The comment also claims that 12,000 working class residents were pushed out of Hollywood and this should be acknowledged and considered when assessing the existing population of the CPA. The comment also states that the EIR lacks the analysis and evidence to support the range of alternatives identified in the EIR, claiming that CEQA does not permit the lead agency to avoid analyzing a reasonable range of alternatives without supporting a finding of infeasibility. The comment also asks for data that supports a no-growth or downsizing alternative, and states that there is not enough information to exclude a downsizing alternative.

As discussed on page 5-1 of the EIR, CEQA Guidelines Section 15126.6 requires that:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative* merits *of the alternatives.*

The purpose of the Alternatives chapter is to provide reasonable alternatives that reduce one or more identified significant impacts of a project in order to aid decision makers in weighing the merits of a project against the potential environmental impacts disclosed throughout the EIR. The EIR need not account for every conceivable alternative to the Proposed Plan including alternatives that do not meet the primary or secondary objectives of the Plan.

Response 15-6

The comment states that the EIR lacks the analysis and evidence to support the range of alternatives identified in the EIR, claiming that CEQA does not permit the lead agency to avoid analyzing a reasonable range of alternatives without supporting a finding of infeasibility. The comment also asks for data that supports a no-growth or downsizing alternative, and states that there is not enough information to exclude a downsizing alternative.

CEQA does not require that an EIR demonstrate the feasibility of alternatives only that a reasonable range of feasible alternatives be provided to aid decision makers in weighing the merits of a project against the project's environmental impacts. As discussed in Response 15-5, a no growth /downsizing alternative would not feasibly achieve the project objectives because one of the primary objectives of the Proposed Plan is to accommodate growth.

Response 15-7

The comment states that the EIR does not provide sufficient analysis as to how the Proposed Plan will mitigate the effects of increased traffic congestion.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated in 2019 to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. The impacts concluded in the recirculated Section 4.15 are less than significant and mitigation measures are not necessary. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts of the Proposed Plan have been included in the discussion of emergency access to reflect the potential secondary impacts resulting from increased congestion in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 15-8

The comment requests additional information and data regarding the decline in the use of transit over time, and in consideration of additional density already being constructed around transit stations.

Based on a study published by Metro,[39] transit ridership in Los Angeles County is evolving similarly to the national trend:[40] Metro bus ridership has decreased, and rail ridership has increased. Since 2008, bus ridership in Los Angeles County has decreased at a rate similar to the national trend (12 percent in Los Angeles compared to 9 percent nationwide). Rail ridership has grown much more quickly in Los Angeles County than in the United States as a whole (27 percent in Los Angeles compared to 11 percent nationwide).

Since the publication of the EIR, UCLA's Institute of Transportation Studies (ITS) published a study on falling transit ridership in Southern California and statewide for the SCAG.[41].The study explored a variety of factors for reduced transit use and concluded that the most significant factor is the increase of motor vehicle access, particularly for low-income households that traditionally have been the most frequent transit users in the region. On a per capita basis, the number of transit trips has mostly declined annually since 2007 and declined consistently since 2013 in both the SCAG region and statewide. The study states that a defining attribute of regular transit riders is their relative lack of access to private vehicles, and within the SCAG region lower income households dramatically increased their vehicle ownership between 2000 and 2015. According to Census data, between 1990 and 2000, the SCAG region added 1.8 million people and 456,000 household vehicles (0.25 vehicles per new resident) in comparison to the time period between 2000 and 2015

[39] Los Angeles County Metropolitan Transportation Authority, *Quality of Life Report*, 2016.
[40] American Public Transportation Association, *Public Transportation Ridership Report*, 1990-2015.
[41] UCLA Institute of Transportation Studies, *Falling Transit Ridership: California and Southern California,* January 2018.

when the region added 2.3 million people and 2.1 million household vehicles (0.95 vehicles per new resident).

While the study concludes that a significant cause of ridership decline is access to private vehicles for those previously dependent on transit, it does not state that the solution to increased transit ridership is to reduce auto-ownership levels. Rather, the study acknowledges that the extensive street and freeway networks in Los Angeles as well as free parking in many areas make driving relatively easy while moving around by modes other than driving is not. Due to the historical investment in making driving relatively easy, it is understandable why people choose to acquire cars. Therefore, the study states that transit agencies should focus on increasing ridership by convincing the vast majority of people who rarely or never use transit to begin riding occasionally instead of driving. For example, if one out of every four people who rarely or never ride transit (approximately 14.5 million (77 percent) of the 18.8 million people in the region) replaced one driving trip with one transit trip every two weeks then annual transit ridership would grow by 96 million and would more than offset the loss in recent years (72 million annual transit rides).

In response to ridership declines, Metro formed a Regional Ridership Improvement Task Force to prepare a Ridership Growth Action Plan[42]. The plan identifies innovative solutions to retain current customers, reclaim past customers, and recruit new customers. Strategies include better information for riders, more collaboration between Metro and the 16 municipal operators in the County, enhanced perceptions of safety and comfort on transit, and improved service quality. Metro is also exploring new technology solutions to increase transit ridership, such as its partnership with Via[43] to provide on-demand door-to-door service to three transit stations in Los Angeles (Artesia, El Monte, and North Hollywood Stations).

The transit improvements contained in the Proposed Plan are intended to further increase transit ridership in Hollywood. Given the existing physical constraints of a built-out urban environment as well as recent State legislation, the Proposed Plan considers improvements to mitigate transportation impacts as measured by VMT, rather than LOS. As described by the Governor's Office of Planning and Research, possible mitigations for VMT include improving or increasing access to transit, improving pedestrian or bicycle networks, providing traffic calming, providing bicycle parking, providing car-sharing, bike sharing, and ride sharing programs, and parking demand management programs.[44] The Proposed Project's list of transportation improvements include transit enhancements, active transportation projects, transportation demand management programs, and roadway and ITS projects; these projects are intended to mitigate VMT.

Response 15-9

This comment states that the EIR does not address the fire safety concerns of Hollywood residents and the impact analyses lacks any demonstration and quantification of "safety." The commenter expresses concern that there is no analysis or data relating to the impacts of drought and climate change and population distribution on the fire hazards in the CPA. The comment states that portions of Hollywood are in a fire hazard severity zone.

The commenter is addressing the analysis of the threshold under Public Services, which as identified in Appendix G and the EIR, is concerned with impacts from new construction that is necessitated by increased needs for facilities from demands on public services. Based on that, the commenter's comments do not raise

[42] Los Angeles County Metropolitan Transportation Authority, Regional Ridership Improvement Task Force, *Ridership Growth Action Plan*, November 2018.

[43] Los Angeles County Metropolitan Transportation Authority, *Launches Partnership with Via to Provide On-Demand Service to Three Busy Transit Stations* (Metro news release: https://www.metro.net/news/simple_pr/la-metro-launches-partnership-provide-demand-servi/, January 2019).

[44] Governor's Office of Planning and Research, January 20, 2016, *Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA: Implementing Senate Bill 743,* available: https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf, accessed on May 24, 2016.

issues or provide substantial evidence supporting a need to change the EIR conclusion or analysis in impact Section 4.14 of the EIR.

Impacts related to emergency access and wildfire in hillsides are discussed under Impact 4.15-4 in the Partially RDEIR Section 4.15, Transportation and Traffic, published in 2019. **Appendix P** of the EIR, Modifications to Appendix G of the CEQA Guidelines, also addresses wildfire impacts, and additional information regarding the LAFD's Strategic Plan to provide public and emergency services has been added to the EIR (see **Chapter 4.0, Corrections and Additions**, for page 4.14-9). To the extent the commenter is raising concerns related to the threat of impacts to safety from increased risk of wildfire caused by the Proposed Plan, the commenter is directed to the discussion under Impact 4.8-8 in Section 4.8, Hazards and Hazardous Material, of the EIR, which addresses whether the Proposed Plan would expose people or structures to a significant risk involving wildfires and provides that:

> Areas identified within a Fire Brush Clearance Zone and VHFHS Zone continue to be at risk for wildfires resulting from a combination of weather, topography, native vegetation, and seasonal Santa Ana winds. Due to the enduring drought conditions and development in fire-prone lands, the risk of wildfires has increased. Impacts from wildfires may include loss or damage to structures and properties, impacts to health as a result of poor air quality, bodily injury or death, and secondary impacts such as mudslides or soil erosion due to the loss of natural plant material that prevents erosion (EIR on page 4.8-45).

While the EIR recognizes the increased hazards from wildfire due to drought conditions, analysis of the Proposed Plan finds that the Proposed Plan will not foreseeably exacerbate or cause impacts related to wildfire risks based on compliance with existing regulatory measures (EIR onnpage 4.8-45). Moreover, as discussed in Chapter 3.0, Project Description, of the EIR, the Proposed Plan is not amending any current land use designations, zoning or development regulations that will increase development in the hillside areas. There are no Change Areas in the hillsides, except Administrative Changes. (Figure 3-6A and related discussion in Section 3.8, Project Description.) The Administrative Changes proposed in the Proposed Plan in hillsides areas, including the VHFHS Zone, are limited to plan/zoning consistency changes to protect open space, such as Subarea 1:5 to change residential land use and zoning to Open Space to reflect existing open space conditions in Griffith Park. Therefore, the Proposed Plan will not foreseeably cause, induce or result in new development or construction activities in the hillsides or foreseeably cause any indirect impacts related to wildfire risks in the hillsides. Nor will the Proposed Plan exacerbate any environmental conditions in the hillsides related to wildfire risk.

Finally, the Proposed Plan's land and use and mobility strategies aim to reduce GHG emissions, which is a direct contributor to climate change, as well as encourage development in areas other than the hillsides. These strategies include directing future housing and job growth near public transit to reduce driving and vehicle miles traveled; supporting a mix of uses and walkability; and implementing a mix of strategies such as mobility hubs, transportation demand management, and technology improvements to reduce vehicle miles traveled. A primary objective of the Proposed Plan is to focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space. The City currently regulates hillside development through a variety of mechanisms, and the Proposed Plan also includes additional regulations for hillside properties, which are generally within fire hazard severity zones. Please see **Response 36-22** for details.

A map of the Very High Fire Hazard Severity Zone in the Hollywood Community Plan Area is provided in the EIR, see Figure 4.8-4 in Section 4.8, Hazards and Hazardous Materials. Also see **Master Response No. 5 – Emergency Services** and **Master Response No. 9 – Hillsides** for additional information.

Response 15-10

The comment requests a review of the cumulative impacts related to fire and safety due to the increased density under the Proposed Plan and states concerns regarding emergency service times. The comment states that although drivers may yield to emergency vehicles, actual physical space cannot be created for the passage of these vehicles. The comment states that the analysis is inadequate. In addition, the comment expresses concern about traffic congestion and roadway closures due to special events or construction.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. Response times were discussed and provided in tables in the recirculated Section 4.15 in 2019 on pages 4.15-54 and 4.15-59 and discussed as part of the analysis for Impact 4.15-4 regarding emergency access; Impact 4.15-4 was concluded to be less than significant (see pages 4.15-45 through 4.15-60 of the EIR). Please see **Master Response No. 5 – Emergency Services**, and **Master Response No. 8 – Transportation & Traffic**.

Response 15-11

The comment states that the transportation analysis should consider different times of the day, days of the week, and times of the year due to congestion levels and should account for the geographic location of Hollywood as a center of tourism and visitation. The comment also states that public transit use is falling.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. Please see **Response 15-7** related to the updated analysis of transportation impacts. Regarding the time period for the transportation analysis, as explained in Section 4.15 on page 4.15-14, the data collection effort for the Existing Conditions assessment included traffic counts recorded by the Regional Integration of ITS Project (RIITS) during the months of February, March, April and May on a Tuesday, Wednesday and Thursday in 2016. Consequently, the count data utilized in the EIR represents a much more robust dataset than the traditional approach of collecting vehicle counts on a single day. Therefore, analyzing traffic impacts during the weekday commute hours when the additional impact of new development will be greatest was found to be the most applicable analysis for the Proposed Plan. The commenter does not provide any substantial evidence as to why the consideration of different days of the week or months of the year would result in different impact findings in the EIR. Regarding the comment related to public transit, see **Response 15-8**. Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 15-12

This comment indicates that the possibility of acts of terrorism and other human created hazards, such as mass shootings should be evaluated in the EIR. The commenter notes that prominent locations like Hollywood are at a high risk for such incidents and is concerned that there is no information or analysis of any security measures being taken. The comment also indicates that the EIR is inadequate and does not conform to requirements of CEQA because the lack of definitions and quantification of impacts prohibits the proper development of reasonable alternatives and comparisons of alternatives.

Please see **Master Response No. 5 – Emergency Services** regarding comments about terrorism. For comments about alternatives, see **Responses 15-5** and **15-6**.

Response 15-13

This comment states that the EIR does not address the police protection concerns of the residents, and the impact analyses lacks any demonstration and quantification of safety. The commenter states that the standards being used to assess impacts are inadequate. The commenter also points to the proliferation of alcohol licenses and various entertainment venues increasing crime and raising quality of life concerns. The comment also expresses concern about terrorism and the effect of gridlock traffic on emergency responders as well as the lack of mitigation measures. In addition, the comment also indicates the current EIR is inadequate and does not conform to requirements of CEQA because the lack of definitions and quantification of impacts prohibits the proper development of reasonable alternatives and comparisons of alternatives.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated in 2019 to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. The impacts concluded in the recirculated Section 4.15 are less than significant and mitigation measures are not necessary. Data regarding response times for non-medical emergencies, structure fires, medical emergencies, and advanced life support were provided in several tables on pages 4.15-54 to 4.15-59 of the recirculated Section 4.15. Impact 4.15-4 concluded that the Proposed Plan has a less than significant impact on inadequate emergency access; see the discussion on pages 4.15-42 to 4.15-59 of the recirculated Section 4.15. Also, see **Master Response No. 5 – Emergency Services** and, also see **Responses 15-5** and **15-6** regarding alternatives.

Response 15-14

This comment states that the lack of data and discussion of the significant impacts identified in the Section 4.15, Transportation and Traffic of the EIR with respect to response times and the effectiveness of all emergency services demonstrates that the EIR is inadequate. The comment also indicates that the current EIR is inadequate and does not conform to requirements of CEQA because the lack of definitions and quantifications of impacts prohibit the proper development of reasonable alternatives and comparisons of alternatives.

See **Responses 15-12** and **15-13**.

LETTER NO. 16

Miki Jackson
Preserve LA
6500 Sunset Boulevard
Los Angeles, CA 90028

Response 16-1

The comment states that TOC affordable housing incentives which allow for additional housing units may not be implementable in areas of the Hollywood Redevelopment Plan. The commenter provides an advisory memo dated January 19, 2019 prepared by the DCP regarding TOC incentives in CRA/LA Redevelopment Plan Areas, a memo from CRA/LA dated June 27, 2018 regarding TOC Density Bonuses, and a Frequently Asked Questions sheet prepared by City Planning regarding the application of TOC incentives in CRA/LA Redevelopment Plan Areas. The comment states that the EIR does not adequately discuss the CRA/LA redevelopment issues and to provide data and analysis.

The Redevelopment Project Area is generally located in the central portion of the Hollywood Community Plan Area, which is described on page 4.10-5 of the Land Use and Planning section of the EIR. The consistencies and discrepancies between the Hollywood Redevelopment Plan and the Proposed Plan are discussed on pages 4.10-22 to 4.10-24, including land use regulations, such as density and affordable housing incentives, and project review and approval procedures. The Proposed Plan's horizon year is 2040, which surpasses the expiration year of the Redevelopment Plan. The EIR analyzes the environmental impacts of the reasonably foreseeable development of the Proposed Plan, including the CRA Plan area, without CRA limitations. The City does not find that the elimination of any conflicting Redevelopment Plan land use policies or requirements, including mitigation measures, would result in a new or different impact from those already analyzed in the EIR. The TOC program in effect applies to certain geographies in the Hollywood Redevelopment Plan area that do not have density limits and to other parts of the Hollywood Community Plan Area. Moreover, since release of the Draft EIR, the transfer of the redevelopment land use related plans and functions to the City became effective and the Proposed Plan now includes an ordinance to amend the Hollywood Redevelopment Plan to clarify its relationship to the Hollywood Community Plan and its

implementing provisions and ordinances, which would expressly repeal any provision that limits the use of TOC in the Plan Area. Please see Exhibit I of the Staff Report for CPC-2016-1450-CPU Staff Report.

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 16-2

The comment notes that the Plan Area lacks an alley system which results in streets being used for loading areas, and that the City has approved projects with no loading docks. The comment mentions a past transportation study conducted for the CRA but does not include the title or publication date of that study, and therefore, the relevance of that study to the Proposed Plan is unknown. Figure 4-2 in the Community Plan shows the existing alley system in the Plan area. The Proposed Plan contains the following policies related to the access and maintenance of existing alleys:

- PR1.7: Preserve alleys. Preserve and maintain existing alleys at the rear of lots which front a Boulevard or Avenue to encourage rear access.
- PR1.18: Public access to streets and alleys. Maintain streets and alleys to be open and accessible for shared public use. Limit closures, vacations and gating for private use. Discourage the creation of "superblocks." Maintain alleys to provide commercial uses with opportunities for off-street loading and unloading and provide pedestrians, bicyclists and motorists with alternative routes of travel.

In addition, the Proposed Plan identifies the following long-term program:

- Long Term Program P56: Conduct a study of the alleys in the Regional Center as the basis for preparing an Alley Improvement Plan to coordinate alley improvements with new development.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 16-3

This comment raises concerns about evacuation from the hillsides and gridlock traffic conditions in the event of an emergency. The commenter states that the lack of adequate data and quantification of the impacts of traffic and other factors, such as road closures for construction, events and other reasons on emergency vehicles, evacuations demonstrate that the EIR is inadequate.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated in 2019 to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. The impacts concluded in the recirculated Section 4.15 are less than significant and mitigation measures are not necessary. Please also see **Master Response No. 5 – Emergency Services**.

LETTER NO. 17

Shivaun Cooney
Latham & Watkins LLP
355 South Grand Avenue, Suite 100
Los Angeles, CA 90071

Responses 17-1 to 17-3

The comment introduces the Forest Lawn Memorial-Park Association and states that cemeteries should be recognized as a distinct use within the Open Space category. The comment requests to modify and update the language for policy PR4.6 language by recognizing cemeteries as a public benefit use.

The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. Within the LAMC Section 14.00 (Public Benefits), cemeteries are listed and called out as a distinct use; and they are considered a public benefit.

Response 17-4

The comment states that the EIR does not consistently distinguish between recreational open space land use designations and other open space uses, namely cemetery uses.

The EIR generally states that the Open Space land use designation corresponds to Open Space zoning, and that Open Space is generally for recreational use. Most of the land areas with the Open Space land use designation in Hollywood is used as parks, such as Griffith Park, Runyon Canyon Park, and Barnsdall Art Park. For clarification, other uses that are found under the Open Space designation in Hollywood include passive open space and cemeteries, as noted by the commenter. The General Plan Land Use Map identifies the approximate location of cemeteries located within the Hollywood Community Plan Area on land designated as Open Space; please see Exhibit C of the Staff Report for CPC-2016-1450-CPU.

Response 17-5

The comment states that there are no woodland areas between Mount Sinai Memorial Park and Forest Lawn Memorial Park – Hollywood Hills.

The EIR provides a programmatic analysis of biological resources, it is not intended to provide site-specific mapping of biological resources. The locations of woodland areas, including the area between the two memorial parks, were obtained from the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB). According to CNDDB, which is a computerized database that inventories the status and locations of rare plants and animals in California, the Southern Sycamore Alder Riparian Woodland is presumed extant in the area between Mount Sinai Memorial Park and Forest Lawn Memorial Park – Hollywood Hills. In the CNDDB database, an occurrence is presumed to still be in existence until evidence to the contrary is received by CNDDB. The existence of woodlands on any given property in the Plan Area would not change the impact analysis or conclusions. The comment does not provide substantial evidence to support the need for new analysis or conclusions in the EIR.

Response 17-6

The commenter expresses their concern over the biological resources mitigation measures and indicates that the mitigation measures are burdensome and/or impractical. The comment states that it is unclear what the legal basis is for requiring Mitigation Measure **BR-1** to have all biological assessments to be circulated to CDFW and for Mitigation Measure **BR-2** to relocate all special status plants. The comment further states that Mitigation Measures **BR-3** and **BR-5** requires the Army Corps of Engineers and CDFW to unnecessarily accept applications and to make pre-decisions about a project's potential jurisdictional impacts. The commenter states that the mitigation measures could bring a halt to the processing of many projects.

The EIR provides a programmatic analysis of impacts and provides mitigation measures appropriate to that scale. Individual projects that conduct project-specific environmental review can propose their own project-specific mitigation measures that may be more appropriate to the local, site-specific conditions.

Within the CPA, most of the undeveloped natural open space areas are located within the Santa Monica Mountains, where most of the biological resources within the CPA can be found due to the amount of undeveloped open space areas and the ability of the mountains to support biological resources. These undeveloped areas, as well as the developed portions in the vicinity of the undeveloped areas, provide food and shelter for wildlife found in the area. Additionally, the Griffith Park Significant Ecological Area (SEA) is located within the Santa Monica Mountains. The SEA, which includes a large portion of Griffith Park, contains critical habitats for sensitive species. As discussed in Section 4.4, Biological Resources, the Griffith Park SEA is important because it has become an island of natural vegetation surrounded by development and

is significant for preserving the geographical variability of vegetation and wildlife that formerly occurred through the region. Additionally, species would pass through the Griffith Park SEA as it moves between the Santa Monica and San Gabriel Mountains via the Verdugo Mountains. Development in the Santa Monica Mountains and Griffith Park SEA could potentially involve the removal of natural habitat or lead to habitat degradation and could potentially have an adverse effect on candidate, sensitive, and special status species; riparian habitat; and other sensitive natural communities. As a result, Mitigation Measures **BR-1** through **BR-6** are necessary to protect these sensitive natural communities and the wildlife, including special status flora and fauna in them or who use them. Mitigation Measures **BR-1**, **BR-2**, and **BR-6** only apply to discretionary projects in or within 200 feet of Griffith Park or that are required to comply with the City's Baseline Hillside Ordinance.

Mitigation Measures **BR-1** and **BR-2** only requires sites that have or are adjacent to sensitive species and/or habitats to submit its biological resources assessment report to CDFW. If no sensitive species and/or habitats are found, then the biological resources report would only be submitted to the City. A biological resources assessment report, as required by Mitigation Measure **BR-1**, would be necessary for discretionary projects in the Santa Monica Mountains area to ensure that no sensitive species would be adversely affected by development, particularly since much of the mountains contain undeveloped natural open space where most biological resources in the CPA can be found. Without the biological resources assessment report, sensitive species in the Santa Monica Mountains may be left undocumented and unprotected. As stated in Mitigation Measure **BR-2**, surveys are only required if the biological resources assessment report requires the surveys. CDFW is a trustee agency for all flora and fauna in the state (CEQA Guidelines Section 15386). Also projects that would result in a take of a listed endangered, threatened, and candidate species would require a take permit under the California Endangered Species Act (CESA) and, CDFW would be involved in the process. Because of CDFW's role in the implementation of CESA, the biological resources assessment report would need to be submitted to CDFW if the report identifies a sensitive species and/or habitat on the potential development site, including any CEQA notices.

Mitigation Measure **BR-3** requires development projects that are located in areas potentially containing jurisdictional waters and riparian habitats to conduct a survey by a qualified biologist to determine if Waters of the U.S. and Waters of the State would be affected b the development project. Under Section 404 of the Clean Water Act, U.S. Army Corps of Engineers (USACE) and U.S. Environmental Protection Agency (USEPA) regulate the discharge of dredge or fill material into Waters of the U.S., including wetlands. Waters of the United States are defined in Title 33 Code of Federal Regulations (CFR) Part 328.3(a) and include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. If Waters of the U.S. are affected, USACE is responsible for issuing permits, waivers, or agreements. CDFW has specific authority through the Fish and Game Code to protect Waters of the State from pollution and to provide oversight and approval of projects altering or diverting lakes or streams. Since the CPA contains seasonal and perennial streams, as well as year-round and intermittent wetlands and riparian vegetation, the survey required by Mitigation Measure **BR-3** would be necessary to determine if a development project would affect Waters of the U.S. and/or Waters of the State. If Waters of the U.S. and/or Waters of the State are affected, Mitigation Measures **BR-4** and **BR-5** would require consultation with USACE and/or CDFW to protect riparian habitat and other sensitive natural communities.

The commenter has not provided any substantial evidence to support the need for additional or different analysis, conclusions or mitigation measures in the EIR. No further response is required.

LETTER NO. 18

Laura Lake, Ph.D., Secretary
FIX THE CITY

Response 18-1

The comment states that the Proposed Plan is inconsistent with General Plan policies related to public safety. The comment does not identify which General Plan policies are in conflict with the Proposed Plan or why. The comment also seeks to incorporate by reference "all comments and submissions made to the City regarding emergency service response times and infrastructure inadequacy" filed regarding the Expo TNP, but the commenter does not identify any specific comments, provide any attachments or links, or even briefly summarize which comments they are referring to and/or who made them.

Section 4.10 of the EIR provides a consistency analysis with the City's General Plan and did not identify inconsistencies. The City's Emergency Management Department (EMD) manages the City's effort in the development of a citywide emergency plan.[45] Emergency response plans and emergency evacuation plans specify appropriate actions to be undertaken with regard to emergency situations such as warning systems, evacuation plans/procedures, and emergency action plans. The Safety Element of the City's General Plan also identifies critical facilities and lifeline systems, such as disaster routes. Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Jurisdictional infrastructure, such as roads and emergency services, are interrelated; therefore, the City of Los Angeles coordinates with neighboring jurisdictions, such as the County of Los Angeles. The County of Los Angeles has developed an Operational Area Emergency Response Plan (ERP) to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. Towards this end, the County along with the City of Los Angeles have developed a draft Los Angeles Operating Area Mass Evacuation Process Guide to ensure a consistent approach to evacuation.[46] The Proposed Project, including any increase in traffic congestion as a result of the Proposed Project, would not conflict with emergency evacuation plans in the City. Please see **Master Response No. 5 – Emergency Services** for further discussion of critical infrastructure and emergency services.

Response 18-2

This comment expresses concern about infrastructure and limiting development in the absence of adequate infrastructure and emergency services.

Please see **Master Response No. 4 – Infrastructure** and **Master Response No. 5 – Emergency Services**.

Response 18-3

This comment states that the first responder data is not accurate, incomplete and incorrect metrics are used.

The commenter did not provide additional information. This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was published in 2019. Data regarding response times for non-medical emergencies, structure fires, medical emergencies, and advanced life support were provided in several tables on pages 4.15-54 to 4.15-59 of the recirculated Section 4.15. Impact 4.15-4 concluded that the Proposed Plan has a less than significant impact on inadequate emergency access; see the discussion on pages 4.15-42 to 4.15-59 of the recirculated Section 4.15. Also, see **Master Response No. 5 – Emergency Services**.

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[45] Los Angeles County, Office of Emergency Management, *Access and Functional Needs Annex,* lacoa.org/misc/Annex%20PubComm.doc.

[46] Los Angeles Operational Area, *Mass Evacuation Process Guide*, https://www.smgov.net/departments/oem/sems/operations/laoa-mass-evacuation-guide.pdf.

Response 18-4

The comment states that the EIR does not adequately discuss full build-out of affordable housing incentive programs and the impact of short-term rentals, and Measure H.

Please see **Master Response No. 2 - Population, Housing, and Employment** which summarizes the assumptions analyzed in the EIR for reasonably anticipated development, which did include the consideration of ADUs and additional units from the TOC affordable housing incentive program and State Density Bonus. The EIR did not consider home-sharing. However, home-sharing is now regulated and the City's ordinance significantly limits the ability for owners use of their property for home-sharing. As such, there is no basis to find home-sharing would change the EIR assumptions related to reasonably anticipated development from the Proposed Plan. The City's Home-Sharing Ordinance was adopted in 2018 (CF-14-1635-S2) with a Negative Declaration (ENV-2016-1277-ND). The Home-Sharing ordinance is for the sharing of one's own primary residence for a limited number of days per year and addresses violations and nuisances; the residence must not be subject to the City's Rent Stabilization Ordinance (RSO), which applies to most non-single-family rental units constructed before 1978, or any other affordability provisions such as an affordable housing covenant. The ordinance curtails the ability of a multi-family building to be converted into short-term rental use.

Measure H is the Los Angeles County Homeless Initiative adopted by voters in March 2017 to provide services for homeless families and individuals through a sales tax increase. The comprehensive program includes rental subsidies, increased services, and housing. Related to Measure H, City voters approved Proposition HHH in 2016 to develop supportive housing for homeless individuals and those at risk of homelessness. The goal of HHH is to build 10,000 units across the City. A mitigated negative declaration ENV-2017-3137-MND was prepared for the City's Permanent Supportive Housing ordinance. To date, a few hundred supportive housing units under HHH have been built or approved in Hollywood, and these numbers are well under the umbrella of reasonably expected development analyzed in the EIR.

Existing or future residential units could be used for home sharing and these types of units would be accounted for in the total number of units. Home-sharing requires owner eligibility and registration and compliance is monitored and enforced. For more information about home-sharing, visit https://planning.lacity.org/plans-policies/initiatives-policies/home-sharing. It is not anticipated that home-sharing will have any significant effect on the City's assumptions related to reasonably expected development because the Home-Sharing ordinance only affects the use of existing residential structures and no new developments will occur. Visitors can only temporarily stay in primary residences, which must be occupied by the homeowner for at least six months of the year. A homeowner of a duplex for example can only rent the unit the homeowner resides in for home-sharing, not the second unit. Therefore, the number of occupied housing units is not expected to change. Due to the regulations, restrictions and registration requirement of the Home-Sharing ordinance, it was concluded that these limitations will limit the units available to be used as short-term rentals and may discourage listings with the implementation of the ordinance; see Exhibit B.1 of CPC-2016-1243-CA Home-Sharing Ordinance. The ordinance only allows the primary residence to be used as short-term rentals. The CEQA Narrative of the Staff Report concluded on page 174 that reductions in the number of short-term rentals should be more visible in areas of highest demand, such as Venice, Hollywood and Silverlake, which appeared to have greater concentrations of entire residences that are listed as short-term rentals. The comment does not raise or identify a new environmental impact and/or would not reduce any identified physical environmental impact. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 18-5

The comment states that "the alternatives analysis does not include TOC, ADU, SB 1818 bonuses."

The alternatives analysis includes TOC, ADU, and density bonuses. Chapter 5.0 Alternatives on page 5-6 of the EIR states: "The Transit Oriented Communities (TOC) Guidelines, along with other housing incentive programs like Density Bonus and Accessory Dwelling Units, have been accounted for in the total reasonably expected development potential of each alternative except Alternative 5 (SCAG Forecast Alternative). A range of numbers is used in Alternative 1 through 4 to represent the potential increase in development from the optional incentive programs." The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 18-6

This comment states the analysis of alternatives does not evaluate the impact of City's Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines), Accessory Dwelling Unit (ADU) regulations, and SB 1818 Density Bonus programs on infrastructure and city services.

Please see **Response 18-5**. See page 5-6 which states: "The Transit Oriented Communities (TOC) Guidelines, along with other housing incentive programs like Density Bonus and Accessory Dwelling Units, have been accounted for in the total reasonably expected development potential of each alternative except Alternative 5 (SCAG Forecast). A range of numbers is used in Alternatives 1 through 4 to represent the potential increase in development from the optional incentive programs." See also Table 5-3 on pages 5-14 to 5-18 in Chapter 5.0 Alternatives of the partially recirculated EIR (2019). Table 5-3 compares the impacts between the Proposed Plan and each of the five Alternatives for every single impact.

LETTER NO. 19

Alfred Fraijo Jr.
Sheppard Mullin Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071

Responses 19-1 to 19-4

The comment introduces the Boeckman Family Revocable Trust and properties owned by the trust. The comment discusses the potential redevelopment of these Regional Center lots with commercial office space and states that some of these lots are in Subarea 2:1B, which would allow more development potential, while some are excluded. The comment expresses concern that having two different zones would make the properties less attractive for redevelopment. The comment requests to add lots (1755 – 1763 Ivar Avenue) to Subarea 2:1B. The comment also requests a floor area ratio increase and the removal of a proposed height limit for Subarea 2:1B. The commenter provides a ZIMAS parcel profile report of 1763 North Ivar Avenue, in Attachment A and Ordinance 165659 with development limitations in Attachment B.

Please see the CPC-2016-1450-CPU Staff Report to review proposed changes to land use designations and zoning. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 20

Alfred Fraijo Jr.
Sheppard Mullin Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071

Responses 20-1 to 20-4

The comment states that the owner has plans to redevelop the property at 1762-1770 North Las Palmas Avenue, which is located near two Metro stations, with a multi-family residential development. The comment requests additional density for Subarea 3:2B and states that previously proposed zoning allowed more density. The comment states that the density restriction contradicts with housing objectives and policies that promote housing opportunities near transit. The comment requests additional density for Subarea 3:2B because this would allow more housing near transit systems. The commenter provides a ZIMAS parcel profile report in Attachment A; Ordinance 165656 with development limitations in Attachment B; the development limitations under the 2012 Hollywood Community Plan Update in Attachment C; and the proposed development limitations of the Hollywood Community Plan Update in progress in Attachment D.

The Proposed Plan includes selected areas near transit systems where additional housing could be built. The subject property is included in the Hollywood CPIO, which has an affordable housing incentive system that would permit additional density for projects that provide affordable housing on site at specified levels and percentages. Please also refer to the CPC-2016-1450-CPU Staff Report for more information. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 21

Alfred Fraijo Jr.
Sheppard Mullin Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071

Responses 21-1 and 21-2

The comment requests a revised description and vision of the Hollywood Media District BID by acknowledging the new types of uses in the area, including new media, art galleries, and interior design, and the preservation of industrial uses for job creation with complementary new residential and commercial uses. The comment requests more FAR for the area and to allow residential uses and hotels. The commenter provides a map of the Media District BID boundaries in Attachment A and the proposed subareas located in the Media District BID boundaries in Attachment B. The commenter also refers to a proposed vision of the Media District BID boundaries called Hollywood Greens prepared by the BID in Attachment D. Hollywood Greens presents the BID area as a destination that is walkable, sustainable, and connected; the attachment includes illustrations of how certain areas look today and how they could look tomorrow. The commenter also refers to Attachment C, which is a map of recommended FARs and uses per the BID.

Additional areas have been added to the jobs incentive subareas in or near the Media District BID to support employment generating uses in response to stakeholder input. Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues** and the Updated **Appendix C**, Proposed Change Area Map and Change Matrix, the Updated **Appendix D**, Draft Community Plan, and the CPC-2016-1450-CPU Staff Report. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Responses 21-3 and 21-4

The comment requests land use and zone changes for proposed subareas in and near the Hollywood Media District BID area. The comment states that these areas have traditionally been used as employment generating media-related and industrial uses but are evolving due to recent new media businesses entering the area. The comment generally requests a 4.5:1 FAR and allowance of residential development, including artist-in-residence, live-work conversion, multi-family residential development, and hotels. The comment suggests prohibiting auto-related uses and storage facilities in the BID area and that the area is in need of additional pedestrian-oriented uses and pedestrian-oriented design to serve employees, visitors, and residents.

The proposed zoning under the Plan Update includes an optional incentive that would allow additional building square footage up to 3:1 FAR on selected properties generally south of Santa Monica Boulevard that incorporate at least 0.7:1 FAR of media-related industrial uses, such as media production and editing, film archiving and storage, sound recording, and facilities for the development of software and other computer and media-related products and services. The additional FAR would be able to accommodate new media and non-residential development for the preservation and promotion of jobs. Please refer to the Updated **Appendix C**: Proposed Change Area Map and Change Matrix for more information. One of the Proposed Plan's primary objectives as stated in Chapter 3.0, Project Description, on page 3.14 is to provide a range of employment opportunities and to promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 21-5

The comment states that the BID applauds the City's recognition and desire to preserve historic resources in the CPA and the BID has a commitment to both the history and future of its district but the proposed zoning for a few areas in the BID may be too restrictive. The comment states that historic preservation review does not seem to be mandated for properties located in these few subareas. The comment also states that the process for reviewing development on such properties is unclear.

Please refer to the Updated **Appendix C**, Proposed Change Area Map and Change Matrix for more information about updated changes to subareas. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 21-6

The comment summarizes comments expressed in the letter. The comment states that while the BID wishes to preserve and encourage traditional entertainment and studio uses, changes have occurred in the past 10 years and the future development and potential of the BID area must be considered by the Plan update. The comment ends with a request to consider permitting residential uses and allowing a greater FAR in this area so that the BID will become not only be an employment driver but also a place for new media tenants seeking to re-activate the area.

Refer to **Responses 21-3** and **21-4**.

LETTER NO. 22

Don Andres, President
Franklin/Hollywood West Residents Association
7470 Franklin Avenue
Hollywood, CA 90046

Response 22-1

The comment provides a summary of the Franklin/Hollywood West Residents Association's mission and expresses concern that the EIR analysis is largely general and does not accurately assess the existing conditions of the Hollywood CPA. The comment also questions why the City seeks to promote development in the Hollywood hillsides citing fire danger as a concern that development will exacerbate these dangers and states that open space should be promoted.

As discussed on page 3-12 of the EIR, CEQA requires an EIR to compare existing physical conditions to conditions after implementation of a project. CEQA Guidelines Section 15125(a) requires that an EIR describe existing conditions as they exist at the time of the NOP publication, which was April 29, 2016. However, the Proposed Plan does not encourage or incentivize or foreseeably be the cause of development or construction in the hillsides. See **Master Response No. 9 – Hillsides**. Please also see **Response 22-2** for further detail on existing conditions related to infrastructure and traffic conditions within the CPA. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 22-2

Without raising specific issues with any analysis in the Draft EIR, or providing any evidence of any particular impact, the comment generally requests analysis and improvements related to infrastructure, utilities (electricity, water and gas), traffic and transportation, parking, and increased gridlock, commuter and visitor noise, and public safety concerns in order to minimize impacts of new development in the flatlands as well as the indirect impacts on the hillside communities. The comment expresses concerns with cut-through traffic in the commenter's neighborhood and requests Implementation Program Number 69.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts have been included in the discussion of emergency access in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4 on pages 4.15-45 to 4.15-60. Please see **Master Response No.4 – Infrastructure, Master Response No. 5 – Emergency Services,** and **Master Response No. 8 – Transportation & Traffic**.

LETTER NO. 23

Frances Offenhauser
Heritage Properties

Response 23-1

The comment is an overall summary of the commenter's letter. Generally, the commenter expresses concern that the Proposed Plan does not address potential loss of historic resources disclosed in the EIR. As discussed in the letter, the commenter believes that identified historic resources discussed in the EIR should have been taken into account in the drafting of the Proposed Plan. The comment also expresses concern that the EIR discloses a significant and unavoidable impact to historic resources without offering any mitigation measures. Finally, the comment summary identifies the Proposed Plan's population projections as

problematic and expresses concern that the EIR analysis is flawed as a result because the projections call for more development than what is needed or consistent with existing development trends, to the detriment of historic resource preservation in the CPA.

Please refer to **Master Response No. 2 – Population, Housing and Employment** and **Master Response No. 3 – Historic Resources**. **Responses 23-2** through **23-14** provide additional details to the commenter's specific concerns.

Response 23-2

The comment identifies the historical resources listed and mapped in the EIR as well as the preservation objectives contained in the Community Plan, the City's Framework Element, and General Plan. The comment states that historic resource data should be integrated into the proposed land use designations and zoning. The comment states that the Proposed Plan is a "Blueprint for the near-total loss of landmarks" and states that the Proposed Plan and EIR can prevent the destruction of the CPA's cultural resources.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 3 – Historic Resources**.

Response 23-3

The comment states that the Proposed Plan's land use has taken precedence over the preservation of historic resources and cites the EIR's conclusion of significant and unavoidable impacts and lack of mitigation measures identified as evidence for this statement.

Please see **Master Response No. 3 – Historic Resources**.

Response 23-4

The comment states that the Proposed Plan and EIR make no attempt to inventively regulate growth in areas with historic buildings. The comment states that preservation tools such as adaptive re-use, measures to disincentivize demolition, parking relief and other potential requirements are missing. The comment also states that the Proposed Plan should include conflict mapping that overlays the proposed Land Use Plan on maps of known historic resources to better plan development.

Figure 4.5-1A to Figure 4.5-1I, a series of maps, in Section 4.5, Cultural Resources, identifies designated resources, eligible resources, City-Designated HCMs, Historic Preservation Overlay Zones and proposed areas of change under the Proposed Plan. **Master Response No. 3 – Historic Resources** provides information on the Proposed Plan's preservation policies, discussion of the EIR analysis for cultural resources, and information about the Hollywood CPIO, which includes a proposed transfer of development rights (TDR) program and review procedures for projects involving historical resources. See the Proposed CPIO (Updated **Appendix E)** for more details.

Response 23-5

The commenter states that the EIR is deficient because the Proposed Plan does not deliver preservation measures consistent with its stated objectives, the EIR makes no attempt to mitigate significant impacts on cultural resources, the elements of the Proposed Plan are internally inconsistent, and there are planning remedies for the significant impacts disclosed in the EIR.

Please see **Master Response No. 3 – Historic Resources**.

Response 23-6

The comment states that the "No Development" Alternative in Chapter 5.0, Alternatives of the EIR is not actually a no development alternative but rather a continuation of the 1988 Community Plan. The comment also states that if the Proposed Plan will result in significant and unavoidable impacts to historic resources then the Plan should be revised and the "No Development" alternative must be selected as the environmentally superior alternative.

As discussed on page 5-1 of the EIR, CEQA Guidelines Section 15126.6 requires that:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative* merits *of the alternatives.*

The purpose of the Alternatives chapter is to provide reasonable alternatives that reduce one or more identified significant impacts of a project in order to aid decision makers in weighing the merits of a project against the potential environmental impacts disclosed throughout the EIR.

Both the Proposed Plan and the alternatives described in Chapter 5.0, Alternatives, have the potential to result in significant or potentially significant impacts. The comment provides no substantial evidence that any impact identified as less than significant should be considered potentially significant. Therefore, there is no basis for revisions to impact conclusions within the EIR and no further response is required (CEQA Guidelines Section 15204(c)).

As discussed in Chapter 5.0, Alternatives, the No Development Alternative was rejected as infeasible because there are no available mechanisms to completely freeze all development in the CPA. What the comment describes as the "No Development Alternative" is actually similar to or the same as Alternative 1, the No Project Alternative. As discussed on page 5-23, the No Project Alternative would actually result in greater impacts to historical resources because it would not include the CPIO District, which has additional regulations to protect historical resources and future development would not be subject to the Proposed Plan's applicable design and neighborhood compatibility protections. Please see **Master Response No. 3 – Historic Resources** and the Final EIR Updated **Appendix E** for more information on the Proposed CPIO.

Response 23-7

The comment expresses concern about the future population and housing numbers in the EIR. The comment states that the EIR uses unacceptable circular reasoning to justify additional construction and that most of the 9,000 new housing units needed in Hollywood for the year 2040 are under construction and/or entitled. The comment also states that the EIR does not provide a credible methodology for housing construction created by the proposed upzoning under the Proposed Plan, and the 1988 Plan provides for an abundance of housing and population growth by accommodating 330,000 people.

Please see **Master Response No. 2 – Population, Housing and Employment** and Appendix B, Methodology.

Response 23-8

The comment describes the Community Redevelopment Agency's role in the review of historic resources. The comment states that the EIR does not sufficiently describe the CRA's procedures nor sufficiently explains the transfer of land use authority from the CRA to the DCP. The comment also expresses general concerns about the historic preservation component of the proposed CPIO and states the CPIO is still under consideration.

The updated draft of the Proposed CPIO provides additional information about review procedures for projects involving historical resources, has a transfer of development rights program, specific design standards for the portion of Hollywood Boulevard located in the designated historic district, and includes a chapter (Character Residential) to preserve the historic character of multi-family residential neighborhoods. The Proposed CPIO is included in Final EIR Updated **Appendix E**. Refer to **Response 16-1** for the discussion of the CRA. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 23-9

The comment states that Section 5.3 of the EIR did not provide mitigation measures for historic resources, the 2005 CRA Redevelopment Plan EIR included mitigation measures for historic resources, and the implementation programs included in the Policy Plan could become mitigation measures. The comment notes that the list of CRA mitigations is attached.

The historic resources mitigation measures from the CRA plan were found to be generally infeasible or not necessary under the Proposed Plan as discussed in Appendix M of the EIR. Appendix M, Inventory of Mitigation Measures includes mitigation measures from CRA EIRs (2005, 1997, and 1986). The tables are organized into three columns: the mitigation measures stated in the Hollywood Redevelopment Plan EIR, the reason(s) for removing the mitigation measure, and the impact of removing the mitigation measure. CRA mitigation measures for historic resources were found to be generally infeasible or not necessary, as explained in Appendix M. The Proposed Plan includes a zoning tool, a CPIO, with regulations for preserving historic resources; see the Final EIR Updated **Appendix E**, Proposed CPIO. Please also see **Master Response No. 3 – Historic Resources**.

Response 23-10

The comment states that the Community Plan has goals, policies, and programs in the Preservation chapter to protect the historic and cultural resources in Hollywood, but this chapter appears to be the opposite of what is contained in the EIR. The comment states that the implementation programs should be the foundation for the EIR's mitigation measures, and requests that the Plan's implementation programs be integrated into the zoning.

As the EIR concluded in Section 4.5, Cultural Resources, the impact is significant and unavoidable for whether implementation of the Proposed Plan would cause a substantial adverse change in the significance of a historical resource. As stated on page 4.5-48, no feasible mitigation measures have been identified because historical resources, even designated ones, could be demolished if an applicant goes through the discretionary review process and receives an approved entitlement. The CPIO has proposed regulations to protect historical resources in Hollywood through development standards, a transfer of development rights program, and review procedures but it is not a mitigation measure. The CPIO is an implementation program and regulatory tool that addresses the Community Plan's Preservation chapter's goals and policies. Please see **Master Response No. 3 – Historic Resources**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 23-11

The comment states that new real estate development is the main cause of the loss of historic resources when the new zoning allows more development. The comment states that the existing 1988 Community Plan already has this tension and the Proposed Plan was to identify and map these conflicts.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 3 – Historic Resources**. Figure 4.5-1A to Figure 4.5-1I, a series of maps, in Section 4.5, Cultural Resources, of the EIR identifies designated resources, eligible resources, City-Designated HCMs, HPOZs, and proposed areas of change under the Proposed Plan.

Response 23-12

The comment describes the differences between zoning and a Community Plan policy. The comment provides a table of proposed preservation policies and implementation programs in the Plan. The comments in the table seek clarification of the timing of the proposed programs and includes additional details or suggested changes to the proposed programs. Below is a summary of the comments contained in the table.

- Plan text comments include: Remove Program P30, as Sunset Square HPOZ is already adopted; add Cahuenga Boulevard to Policy P1.5 (distinctive street features); and create an implementation program for P1.6 (study preservation tools).

- CPIO and zoning recommendations include: Integrate provisions from the CRA Redevelopment Plan; add Vista del Mar, Ivar Hill, Colegrove, Hollywood North Multi-family, and 1700 Hudson as significant neighborhoods and districts; add adaptive reuse provisions; expand the CPIO to include residential neighborhoods; and require additions conform with Preservation Brief 14. Revisions to proposed Land Use designations to reduce conflicts with historic resources. For Afton Place and Hollywood Blvd, requests were included to use HPOZ processes, override TOC, and use Preservation Brief 14.

- Work programs requested: An economic study for Policy P1.11 (financial resources); improve upgrades to ZIMAS, and designate all National Register listings as HCMs. The comment includes a question about protecting distinctive street features, such as the Walk of Fame and its maintenance.

An implementation program is an action, procedure, program or technique that carries out goals and policies, as stated in Chapter 1 of the Community Plan (Final EIR Updated **Appendix D**, Draft Community Plan). Implementation programs are comprehensive in nature, encompassing amendments of existing and preparation of new plans, ordinances, and development and design standards; modification of City procedures and development review and approval processes; and interagency coordination. Completion of a recommended implementation program will depend on a number of factors such as citizen priorities, finances, and staff availability. These recommendations are suggestions to future City decision-makers as ways to implement the goals and policies contained in this Community Plan. As stated in Chapter 7 of the Community Plan: "It is important to note that program implementation is contingent on the availability of adequate funding, which is likely to change over time due to economic conditions, the priorities of federal, state and regional governments and funding agencies, and other conditions."

Hence, the listing of recommended implementation programs in the Community Plan does not obligate the City to accomplish them but rather helps to prioritize programs as funding becomes available and/or helps to strengthen grant applications for future programs. The program to designate Sunset Square HPOZ at a future time has been removed because it is already an HPOZ; please note that the CPIO helps implement Policy P1.6. Please see the Community Plan (Final EIR Updated **Appendix D**, Draft Community Plan). For general comments on the Plan text, see **Master Response No. 1 – General Comments and Non-CEQA Issues**. The Proposed CPIO includes both commercial and residential zoned properties, including residential districts, such as McCadden-De Longre-Leland, DeLongpre Park and Vista del Mar. Please see the Proposed CPIO (Final EIR Updated **Appendix E**) and **Master Response No. 3 – Historic Resources**.

The Community Plan recognizes the preservation of distinctive street features in Chapter 4. In June 2019, Council District 13 announced the kickoff of the preparation of a Master Plan that will preserve and improve the Walk of Fame through the Council District's HEART of Hollywood initiative; the City of Los Angeles Bureau of Engineering is the lead agency on the project. Requests to commission an economic study and to designate all National Register listings within the CRA area as HCMs would be full work programs that require authorization and initiation from the City Council to provide funding for a program that would generally require city planning staffing and CEQA review, a public participation process, and coordination. The Community Plan includes Chapter 7 – Implementation and includes various programs that address future historic studies on pages 7-5 to 7-8, including the preservation of existing and new HPOZs. For additional

information on the designation process for HCMs, please see page 4.5-7 of the EIR. The comments are noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 23-13

The comment suggests possible practices and requirements to incorporate the CRA obligations and requirements for historic buildings into the Community Plan Update. The comment provides seven tables (A to G) that provide text from selected portions of the CRA's Redevelopment Plan and other related requirements or recommendations: the CRA's role in the review of historic resources and proposed projects; the CRA's design review requirements; two mitigation measures from the 2003 CRA Redevelopment Plan EIR; CRA Redevelopment Plan's development programs; inclusion of existing and proposed historic preservation policies in the Community Plan; recommended mitigation measures; and CRA design district plans.

The table includes the commenter's notes and questions on the incorporation of CRA programs in the Community Plan and if/how they will be assumed by the Department of City Planning. Below is a general summary of the comments in the tables.

The comments in Tables A-D cite various sections of the Hollywood Redevelopment Plan, the Redevelopment Plan's EIR, or related documents that generally address historic preservation, design review, mitigation, and land use to integrate into the Plan Update. Table E provides existing historic preservation regulations and proposed historic preservations regulations. Table F contains six recommended mitigation measures, which include: traffic and parking mitigations and a transfer of development rights program from the CRA Redevelopment Plan, adoption of an Interim Control Ordinance (ICO) for designated and eligible Historic Districts within the CRA Redevelopment Plan boundary and the adoption of potential new HPOZs in this area, mapping of identified historic resources, demolition prohibition, and notifying Hollywood Heritage of proposed demolitions. Table G is the commenter's questions for how recommended implementation programs would be implemented: design districts or specific plans for Hollywood Boulevard, Franklin Avenue, and the Core Transition District within the CRA Redevelopment Plan boundary, a parking study and review, the preparation of a new historic resources survey, and a density transfer procedure.

The Hollywood Community Plan Update maintains existing historic preservation regulations and programs such as HPOZs, includes a Preservation chapter in the Community Plan, and has proposed zoning tools and regulations to protect historical resources, including the CPIO. The CPIO includes review procedures for projects involving historical resources, a transfer of development rights program, and development standards that will preserve the character of historical resources, including residential districts. See the Updated CPIO (Final EIR Updated **Appendix E)** for more information. Impact 4.5-1 of the Cultural Resources section of the EIR on page 4.5-48 concluded that there is no feasible mitigation to prevent the demolition or substantial alteration of historical resources. The historical resources mitigation measures from the CRA plan were found to be generally infeasible or not necessary under the Proposed Plan as discussed in Appendix M of the EIR. Please also see **Master Response No. 3 – Historic Resources**. Requests to adopt an ICO, HPOZ, Specific Plan, and HCMs would be full work programs that require substantial resources to fund city planning staffing that would include CEQA review, a public participation process, and coordination. At this time, the City has allocated funds to other work programs. Also, refer to **Response 23-11** regarding the purpose of an implementation program. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 23-14

The header of this comment states, "Plan capacity in existing 1988 Community Plan-330,000 persons." Following the header is the same table provided by the commenter in **Response 23-11**.

Refer to **Response 23-11**.

Response 23-15

The comment is a graph of the commenter's estimates of future population numbers (331,000) that could be accommodated by the existing 1988 Hollywood Community Plan Update.

The graph itself does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The graph is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. For earlier comments in the letter regarding population, refer to **Master Response No. 2 – Population, Housing, and Employment**.

LETTER NO. 24

Lannette M. Schwartz, MCH
Historic Conservation, LLC
1645 Vine Street, Unit 411
Los Angeles, CA 90028

Response 24-1

The comment states that Section 4.5, Cultural Resources, of the EIR omitted the historic resources identified in the 1997 Hollywood historic neon sign survey codified by City Council (CF-97-2081) (CAO-0150-06524-000) and the proposed CPIO does not include the historic sign references in the Hollywood Sign District ordinance. The comment states that a historic resources survey was conducted by the CRA and/or the City Planning Director and requests the Cultural Resources section of the EIR be updated to reflect the commercial signs not already identified and to add the signs to Table 4.5-2: City Designated Historical Cultural Monuments as other designated resources. The comment also requests adding information about historic signs to the proposed CPIO, including referencing Hollywood Sign District Ordinance No. 181340.

Council File (CF-97-2081) (CAO-0150-06524-000) houses the action of the City to approve "permits to enter" covenant agreements for the repair and maintenance of historic neon signage. The file describes the Hollywood Neon Project, a relighting campaign for 24 neon signs in Hollywood. Within the Council File a map of 31 signs is provided. The Council File does not contain an action to designate signs as historical resources, nor does it recognize a survey determining the signs are eligible historical resources.

In 1997, the CRA conducted a reconnaissance level survey, which is explained in National Register Bulletin #24, "Guidelines for Local Surveys: a basis for preservation planning," as "a 'once over lightly' inspection of an area, most useful for characterizing its resources in general and for developing a basis for deciding how to organize and orient more detailed survey efforts." Eight hundred and eight properties were surveyed in 1997, although no Department of Parks and Recreation (DPR) forms were prepared. [47] Findings of the 1997 survey are classified in the California Historical Resources Code as 7R, "Identified in Reconnaissance level Survey: Not evaluated."[48] Therefore, the 1997 CRA survey did not identify eligible historical resources.

Subsequent to the 1997 reconnaissance level survey, multiple historic resource surveys were completed in the Plan Area. All 31 neon signs indicated in the Council File were reviewed against the provided Figures 4.5-1A-2C and subsequent historic resources surveys including the Historic Resource Inventory (HRI) provided by the California Office of Historic Preservation (OHP). Of the 31 neon signs listed, 29 signs are

[47] Anne Derry, H. Ward Jandl, Carol D. Shull, and Jan Thorman, National Register Bulletin #24, Guidelines for Local Surveys: a basis for preservation planning, (National Park Service, 1977), revised by Patricia L. Parker in 1985,(pg12) . This bulletin is available at the web site, http://www.cr.nps.gov/nr/publications/bulletins/nrb24/.

[48] California Office of Historic Preservation, *California Historical Resource Status Codes,* http://ohp.parks.ca.gov/pages/1069/files/chrstatus%20codes.pdf

located in the Hollywood CPA; the other two signs, Ravenswood and El Royale, are located outside of the CPA and were therefore not included in the documentation. Of the 29 signs in Hollywood, 24 signs are designated signs or located on a designated historical resource; three signs are located on identified eligible historical resources; one sign, the Hollywood Wilcox Hotel no longer exists; and one sign/building, the Mark Twain Hotel, was found not to be eligible on any of the numerous historic resources surveys. Therefore, the signs that are noted as designated and eligible resources were reviewed for consistency with the figures included in the Cultural Resources section and were part of the impact analysis.

The Hollywood Signage Supplemental Use District, Ordinance No. 181340, recognizes the contribution of signage as a part of Hollywood's architectural history and regulates signage within its specified boundary. Properties in the Hollywood CPA, whether located in the proposed CPIO boundary or outside of the CPIO, are subject to the regulations in the Hollywood Signage Supplemental Use District.

Based on all of the above, no further analysis is necessary, and analysis of the 1997 Hollywood historic neon sign survey would not change impact analysis. The commenter has not provided substantial evidence that there will be a significant impact that the EIR has not analyzed and identified.

LETTER NO. 25

Rana Ghadban, President & CEO
Hollywood Chamber of Commerce
6255 Sunset Boulevard, Suite 150
Hollywood, CA 90028

Responses 25-1 and 25-2

The comments introduce the Hollywood Chamber of Commerce and indicate their concern regarding different design standards and guidelines for Sunset Boulevard and Hollywood Boulevard resulting in unclear expectations, and their recommendations to resolve contradictions. The comments note that Subarea 4:2B and Subarea 4:5 appear similar but have different proposed FARs. The comments indicate that Hollywood is a Regional Center that will see more than a reasonable level of development and hopes that the impacts will be properly analyzed by the City. The comment thanks City staff for working on the Plan Update.

The Hollywood CPIO has the same development standards for the entire Regional Center in central Hollywood. The portion of Hollywood Boulevard that is part of the Hollywood Boulevard Commercial and Entertainment District, a designated historic district, has specific standards that address historic preservation and compatibility. Please refer to the Final EIR Updated **Appendix C**, Proposed Change Area Map and Change Matrix and to the CPC-2016-1450-CPU Staff Report and Exhibits for more information. Subarea 4:2B has been merged with Subarea 4:5. The Regional Center, with its transit infrastructure, mix of uses, and land use designation, is reasonably expected to accommodate additional development potential in the future. Anticipated growth in the Hollywood Community Area is being directed to the Regional Center and corridors with existing transit systems as outlined in the EIR's primary objectives in Chapter 3.0, Project Description, on page 3-13. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 26

Richard Adkins, President
Hollywood Heritage, Inc.
P.O. Box 2586
Hollywood, CA 90078

Response 26-1

The comment provides a general summary of Hollywood Heritage, Inc.'s role and objectives and states that there is an inherent conflict between the stated goal of the Proposed Plan to protect historic and cultural resources and the EIR's disclosure of significant and unavoidable impacts to historic and cultural resources.

Please see **Master Response No. 3 – Historic Resources**.

Response 26-2

The comment states the Alternatives analysis contained in the EIR does not adequately explain the conflict discussed in Comment 26-1 and that the "No Development" alternative is the environmentally superior alternative.

As discussed in Chapter 5.0, Alternatives, the No Development Alternative was rejected as infeasible because there are no available mechanisms to completely freeze all development in the CPA. What the comment describes as the "No Development Alternative" is similar to or the same as Alternative 1, the No Project Alternative. As discussed on page 5-23, the No Project Alternative would result in greater impacts to historical resources because it would not include the CPIO, which has additional regulations to protect historical resources. Please see the Final EIR Updated **Appendix E** for more information on the Proposed CPIO.

Response 26-3

The comment states that to mitigate demolition and maximize the use of existing buildings, the Proposed Plan could include incentives or penalties for demolition of historic buildings by neglect. The comment states that the proposed CPIO could be improved by incorporating CRA "mitigations" into the CPIO.

The CRA's mitigation measures for historic resources were generally found to be infeasible under the Proposed Plan as stated in Appendix M, Inventory of Mitigation Measures. Please see **Master Response No. 3 – Historic Resources** and the Final EIR Updated **Appendix E**, Proposed CPIO for more information regarding historic preservation regulatory standards that would discourage demolition.

Response 26-4

This comment describes the Community Redevelopment Agency's role in the review of land use and historic preservation, states that the EIR does not sufficiently describe the CRA's procedures, and states that the EIR did not examine the transfer of land use authority from the Community Redevelopment Agency to the DCP.

Refer to Response 16-1 for the discussion of the CRA, as well as the CPC-2016-1450-CPU Staff Report and Exhibit I for the draft ordinance to amend the Hollywood Redevelopment Plan, which is part of the Proposed Plan. Please also see **Master Response No. 3 – Historic Resources**.

Response 26-5

This comment states that the implementation tools from the 1988 Community Plan have not been incorporated into the Community Plan and requests that proactive tools such as HPOZ, HCM, transfer of development rights, and specific plans should be included as implementation tools to mitigate substantial adverse impacts to historic resources.

Existing implementation programs such as HPOZs, HCMs, and Specific Plans will continue under the Plan. The Plan includes proposed implementation programs in the Preservation Chapter to develop a historic district in Los Feliz, study the Melrose Hill neighborhood, and study the feasibility of implementing a transfer of development rights program. The proposed CPIO includes a transfer of development rights program as well as review procedures for projects involving historical resources; see the Final EIR Updated **Appendix E**. Section 4.5, Cultural Resources of the EIR concluded that there is no feasible mitigation to prevent the demolition or substantial alteration of historical resources. Please also see **Master Response No. 3 – Historic Resources**. The CRA mitigation measures for historic and cultural resources were found to be infeasible or unnecessary under the Proposed Plan as stated in Appendix M Inventory of Mitigation Measures. As stated in Appendix M, SurveyLA completed a survey in the Plan Area, several HPOZs have been adopted and many individual buildings have been designated as HCMs. Additionally, the CRA completed a survey shortly before the redevelopment land use related plans and functions were transferred to the City in 2019. The survey was sent to the City and it has been uploaded to ZIMAS.

Response 26-6

The comment states portions of the historic preservation policies in the Community Plan are inconsistent with the EIR, including the proposed land use and zoning. The comment says the Preservation chapter in the Community Plan includes policies for historic preservation but the EIR does not identify any mitigation measures and suggests that the implementation programs in the Plan could be used as mitigation measures.

Refer to **Response 23-9**.

Response 26-7

The comment states that new real estate development is the main cause of the loss of historic resources when the new zoning allows more development. The comment states that the 1988 Community Plan already has this tension and although the EIR includes some maps to show the locations of proposed zone changes and historic resources, additional mapping is needed in the Final EIR. The commenter attaches two maps of proposed subareas and where historical resources have been surveyed. The comment also states that there are no mitigations in the EIR to minimize the identified impacts to historic resources. The comment also states that the proposed CPIO should apply to eligible historic resources and all property types.

The proposed CPIO applies to both commercial and residential zoned properties and includes provisions to address eligible historical resources. Please see the Final EIR Updated **Appendix E**, Updated CPIO regarding historical resources. Figure 4.5-1A to Figure 4.5-1I, a series of maps, in Section 4.5, Cultural Resources, identifies designated resources, eligible resources, City-Designated HCMs, HPOZs and proposed areas of change under the Proposed Plan. Please also refer to **Master Response No. 3 – Historic Resources**.

Response 26-8

The comment states the historic resources mapping found in the EIR should be used to re-examine the Land Use Plan to retain historic resources. The comment also states that one of the Proposed Plan's objectives is to address historic preservation but previous zoning, discretionary actions, and entitlements have not supported preservation and the Proposed Plan continues to have issues.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 3 – Historic Resources.** The comment does not identify any new physical environmental impacts, raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 26-9

The comment states its support of the Community Plan's Preservation chapter, but the next step is to integrate the EIR findings for historic resources in the Land Use plan, which would then confirm the aspirations in the Preservation chapter. The comment further states that past discretionary actions have incentivized demolitions and incompatible new construction, and the Proposed Plan's generous building envelopes would exacerbate these issues and the EIR has no mitigation measures.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 3 – Historic Resources**.

Response 26-10

The comment states that the EIR Land Use section is inadequate because it does not address the preservation goals of the Proposed Plan and does not provide analysis for impacts on historic resources related to land use changes. The comment notes that proposed height districts and zone changes are of particular concern to historic resources and states that the Land Use Plan and EIR should integrate historic buildings rather than conclude that there would be significant and unavoidable impacts to historic resources.

Please see **Master Response No. 3 – Historic Resources** for discussion of impacts to historical resources. Regarding the analysis provided in the Land Use section of the EIR, Appendix G of the CEQA guidelines identifies explicit impact criteria for evaluating land use impacts including physical division of established communities, conflicts with land use plans, policies or regulations, and conflicts with habitat conservation plans. These impact criteria are discussed in detail in Section 4.10, Land Use and Planning, and impacts to historical resources are discussed in Section 4.5, Cultural Resources, which also addresses the Proposed Plan's potential for impacts on historical resources including those posed by proposed land use changes and height districts.

Response 26-11

The comment states that the NOP comment submitted by the commenter notes that the purpose of CEQA is to identify historic resources in the area and to analyze the impact of land use decisions on the built environment. The comment also states that the commenter acknowledges that the EIR analyzes and identifies that there will be significant adverse impacts to properties identified as historic resources if the project includes demolition or substantial alteration but mitigations should be used to reduce the impact to historic resources. This comment is the precursor to six items regarding historic resources in the EIR, which is addressed in **Responses 26-12** to **26-17**.

The NOP comment letters are included in Appendix A. Please see **Master Response No. 3 – Historic Resources**.

Response 26-12

The comment states that the Cultural Resources section of the EIR has discrepancies in how cultural resources are described and depicted, particularly in Figure 4.5-1. Similarly, the comment states that Appendix L of the EIR does not include HCMs which are "designated resources" and also does not include eligible resources identified as part of SurveyLA's 2010 CRA survey. It should be noted that the comment does not specify what the discrepancies are or which resources have been mischaracterized or otherwise omitted other than stating that the district boundaries from the 2010 CRA survey are not shown in Figure 4.5-1. Finally, the comment questions why the EIR does not identify any mitigation to address the disclosed significant and unavoidable impacts.

Regarding the characterization of resources displayed in figures contained in the EIR, page 4.5-13 of the EIR discusses the data sources for Figures 4.5-1A through 4.5-1I which include HCMs and HPOZs provided by the City's Office of Historic Resources. Data from the California State Historic Resources Inventory (HRI)

is also included depicting National Register and California Register listed resources and Figures 4.5-1A through 4.5-1I also depict data for properties surveyed in the Hollywood Redevelopment Project Area, referred to by the commenter as the "2010 CRA Survey." The list of HCMs is provided in Table 4.5-2 on pages 4.5-26 through 4.5-30. The EIR may not include all resources, but any such deficiencies would not affect the conclusions of the EIR. The EIR appropriately provides adequate analysis of impacts to cultural resources which does not require identification and mapping of every resource. The identification of resources in the EIR is sufficient to characterize the CPA as being rich in resources. For a response to concerns about the significant and unavoidable impact to historical resources and mitigation measures, or lack therof, please see **Master Response No. 3 – Historic Resources**.

Response 26-13

The comment states that "conflict maps" are essential for understanding the impacts to historic resources by overlaying historic resources maps with proposed zoning and land use maps. The comment states that the maps provided do not show the extent of the conflicts between historic resources and contemplated zoning. The comment also states that the Hollywood Boulevard Commercial and Entertainment District is listed in the National Register of Historic Places and if there are no processes and design guidelines to protect this area, which has Regional Commercial land use/zoning, the City would be responsible for eradicating one of the most important historic districts in the United States.

The maps provided in Section 4.5, Cultural Resources, of the EIR in Figures 4.5-1A through 4.5-1I identify the locations of the designated and eligible historical resources in the Project Area as well as the boundaries for the proposed subareas, where land use and/or zoning changes are proposed. Active Change Areas are identified in Figures 3-6A to 3-6G in Chapter 3.0 of the Draft EIR. The Hollywood Boulevard Commercial and Entertainment District is fully contained within the proposed CPIO, which has regulations and design guidelines to address historic preservation, including some specific standards for the portion of Hollywood Boulevard in the national historic district. Please see Final EIR **Appendix E**, Updated CPIO, which would offer several preservation tools, and also refer to **Master Response No. 3 – Historic Resources**.

Response 26-14

The comment summarizes the conclusion of the EIR that the Proposed Plan will result in a significant and unavoidable impact related to historic resources and states that there is no reason not to list feasible mitigations to lessen the impact.

Please see **Master Response No. 3 – Historic Resources**.

Response 26-15

The comment claims that an alternative to the "wholesale demolition of historic resources" is not included in the EIR and that an avoidance alternative should be included that reconciles SCAG growth projections with locations where growth can be focused without affecting historic buildings. The comment goes on to state that in absence of such an alternative, the No Development Alternative is environmentally superior and states that such an alternative would be a continuation of the 1988 Plan. The comment also states that the 1988 Plan had a buildout population of 46,000 more people than expected under the current 2040 projections and thus, the 1988 Plan should be maintained with some additional zoning restrictions. The comment also notes that the EIR did not consider the amount of housing that could be and is currently being built on commercial land, as well as State Density Bonus, and TOC incentives under the existing plan (No Project Alternative).

As discussed in Chapter 5.0, Alternatives, the No Development Alternative was rejected as infeasible because there are no available mechanisms to completely freeze all development in the CPA and it would not meet the underlying purpose of the Project to accommodate growth. What the commenter describes as the "No Development Alternative" is actually similar to or the same as Alternative 1, the No Project Alternative. As discussed on page 5-23, the No Project Alternative would result in greater impacts to historical resources

because it would not include the CPIO District which has additional regulations to protect historical resources and future development would not be subject to the Proposed Plan's applicable design and neighborhood compatibility protections and would therefore not be the environmentally superior alternative. The No Project Alternative includes the existing zoning of commercial areas within the CPA and the alternative analysis considered the possibility that commercially zoned properties could also include residential uses. The State Density Bonus, and the TOC incentives were also considered as part of the No Project Alternative. As discussed in Chapter 5.0 of the Draft EIR, the No Project Alternative would not achieve most of the Proposed Plan's primary and secondary objectives. It would not direct growth and maximize development opportunities around existing transit systems, transit hubs, and corridors. Known inconsistencies between land uses, zoning, and General Plan land use designations would not be corrected or updated. The No Project Alternative would have greater impacts on cultural resource than the Proposed Plan and would also have greater impacts to biological resources and GHG. See the Final EIR Updated **Appendix E** regarding the Updated CPIO.

For discussion of population associated with the Proposed Plan, the 1988 Plan, and SCAG data, please see **Master Response No. 2 – Population, Housing, and Employment**. For detailed discussion on the significant and unavoidable impacts associated with the Proposed Plan please see **Master Response No. 3 – Historic Resources**.

Response 26-16

The comment states that mitigation measures should be used to protect historic resources and that mitigations currently under the responsibility of the CRA could be assumed by the Office of Historic Resources. The comment further requests that language regarding the process and the review of projects be added to the Community Plan. The comment also requests modifications to the CPIO to require that all projects comply with the Secretary of the Interior's Standards, including non-historic buildings. The comment then states the Standards can be used as a mitigation measure. The comment also states that the CRA urban design plans should be incorporated into the CPIO as a mitigation measure and other suggested CPIO mitigations include: applying the CPIO to all property types, requiring an approved replacement project before demolition can proceed, and including incentives for rent stabilized resources within the CPIO similar to the program in West Hollywood.

Although there are no identified feasible mitigation measures, several regulatory standards that address historic preservation, including review procedures for projects involving historical resources and a transfer of development program, are included in the proposed CPIO (see the Final EIR Updated **Appendix E**).

The suggested mitigation measure to require that all projects comply with the Secretary of the Interior's Standards, including non-historic buildings, is infeasible. Creating additional processes, including regulations for non-historic properties, to the review and approval of projects would require use of additional staff resources that are not available at this time. Such a mitigation measure would also put additional regulations on development projects that provide community benefits, including mixed-income and 100% affordable housing projects. This mitigation measure is unnecessary, undesirable, and would not result in an efficient use of City resources or desirable land use outcomes. Additionally, the inclusion of the suggested mitigation measures would not reduce the impacts on historical resources to less than significant levels.

The CPIO's historic preservation regulations apply to both commercial and residential-zones properties. Refer also to **Master Response No. 3 – Historic Resources**. The comments are noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 26-17

The comment suggests as mitigation that the Preservation Chapter of the Plan be rebranded as a Preservation Element that provides clear implementation strategies. The comment also cites the City of Santa Monica Downtown Community Plan as a potential model for the Preservation Chapter.

Although the comment suggests that the Preservation Chapter of the Plan does not provide implementation strategies, Chapter 7, Implementation of the Proposed Plan provides numerous implementation programs linked directly to the policies contained in the Preservation Chapter of the Proposed Plan. These include Program Numbers P28 through P41 and P65 through P68 contained in Table 7-2 in the Proposed Plan. Adding additional policies or "rebranding" the Chapter is not desirable from a policy perspective, including because the City does not find it desirable to put additional burdens on desirable and needed development.

Response 26-18

The comment provides a conclusion to the letter and summary of the preceding comments. The comment states that the Plan does not integrate historic buildings into land use planning and plans for adverse effects on historic resources and states there is an inherent conflict between the Plan's objective to protect historic resources while also planning on demolishing historic resources. The commenter also reiterates that the comment letter provides several options to avoid or reduce potential impacts to historic resources.

As discussed in **Responses 26-1** through **26-17**, the Proposed Plan and EIR do not plan for, propose or identify direct impacts to specific historical resources but rather the Proposed Plan and EIR acknowledge that there are no existing or proposed regulatory or planning remedies to completely avoid the demolition of historic buildings. Additional regulatory measures such as the one in the proposed CPIO and various Plan policies and implementation programs to further protect historical resources are proposed. The City does not find additional measures beyond those in the proposed CPIO and proposed policies to be feasible as they would either require additional resources that are needed elsewhere or they would put additional burdens on desirable and needed development. Please see **Responses 26-1** through **26-17** as well as **Master Response No. 3 – Historic Resources**.

LETTER NO. 27

Anastasia Mann, President
Hollywood Hills West Neighborhood Council
7095 Hollywood Boulevard
Box 1004
Los Angeles, CA 90028

Response 27-1

The comment includes introductory text about the Hollywood Hills West Neighborhood Council and a background of its PLUM Committee meetings in which the comments on the EIR were discussed and submitted.

No response is required to the introductory text. The responses below address specific comments on the Proposed Plan and the environmental analysis in the EIR.

Response 27-2

The comment states that the project location description should include the City of West Hollywood as a southern boundary along Fountain Avenue. The project location description should also include foothills, not just hills and flatlands. The comment also states that the description of existing land uses is inaccurate and specifies that multi-family housing is located east of La Brea Avenue, along Hollywood Boulevard, Vine Street, Highland Avenue, Sunset Boulevard east of Highland Avenue, Santa Monica Boulevard, and south of Franklin Avenue between Highland Avenue and Cahuenga Boulevard. The commenter believes that HPOZs should be mentioned in the existing land use discussion. The comment also states that the proposed treatment option for La Brea Avenue between Sunset Boulevard and Hollywood Boulevard is not possible with the development that has already occurred in the section.

The description of hillsides on pages 3-4 through 3-5 in Chapter 3.0, Project Description, generally encompasses the hills, mountains, and foothills. Additionally, the description of existing residential land uses on page 3-5 provides a general depiction of the location of these uses in the CPA. The City of West Hollywood is described as being west of the Community Plan Area on page 3-4.

The CPA contains several Historic Preservation Overlay Zones (HPOZs), but HPOZs are not discussed under "Existing Land Uses" in Chapter 3.0, Project Description, page 3-5 of the EIR because the intent of this portion of the Project Description is to generally characterize the types of land uses that are found in the CPA, rather than to characterize existing zoning or overlay zones. The six HPOZs in the CPA are discussed in Section 4.10 Land Use and Planning on page 4.10-7 and are identified in Figure 4.10-1. The individual HPOZs are also discussed on Page 4.5-31 of the EIR, Section 4.5, Cultural Resources, and Figures 4.5-1A through 4.5-1I identifies the location of the HPOZs.

Regarding the proposed treatment option for La Brea Avenue between Sunset Boulevard and Hollywood Boulevard, the proposed Transit Enhanced Network (TEN) treatment is consistent with the City's Mobility Plan 2035. La Brea Avenue between Hollywood Boulevard and Sunset Boulevard is shown as part of the TEN in Figure 4.15-7 and has the street designation of Avenue 1 Modified. As shown in Table 4.15-8, two treatment options were considered for implementing the TEN on this segment of La Brea Avenue. One option considered all-day bus only lanes and the other considered peak period bus only lanes. The widening under the Avenue 1 Modified designation would occur as feasible given existing and future right-of-way constraints over time. As properties redevelop, the City will have the opportunity to widen La Brea Avenue to meet the Avenue 1 Modified cross-section. The final design and implementation of the TEN will consider the available roadway cross-section and number of travel lanes. During the initial implementation of the TEN, buses may need to travel in the same lane as vehicles in some portions until full widening can occur at a future date. As further explained in the EIR (page 4.15-35), the Proposed Plan's mobility network would be implemented overtime and the Proposed Plan would not, itself, entitle or otherwise approve any transportation projects.

Response 27-3

The comment states that "skyline palms' should be included as a scenic resource in the Aesthetics section of the EIR because they are unique to the Project Area and should be protected. The comment also states that the analysis for the West Region in Impact 4.1-3 does not account for TOCs, which could be taller. The comment asserts that the EIR does not discuss or mitigate for taller structures associated with TOCs. The comment asserts that the less-than-significant impact on visual character is not correct because of the TOC impacts on the Proposed Plan's increased FAR and height limits. Additionally, the cumulative impacts discussion on visual character does not mention TOCs, which the commenter believes would have a cumulative impact on density and height.

Skyline palm trees are located in other parts of the City and across in Southern California. As discussed under Aesthetics Impact 4.1-3 on pages 4.1-32 to 4.1-40, the Proposed Plan would not substantially degrade the existing visual character of the CPA. While the skyline palm trees are part of the existing visual setting, and appreciated by residents and visitors, adding them expressly to the existing setting in the EIR would not change the Aesthetic impact analysis because they are not considered scenic resources. While skyline palm trees are found within the CPA, these types of palm trees are not designated as HCMs, are not listed in the National Register or California Register and are not a tree species that are protected by the City's Tree Preservation Ordinance. The historic preservation aspect is mentioned here because historical resources can include non-buildings, such as signage, air raid sirens, and landscaping. The palm trees along Highland Avenue (south of Melrose Avenue) are specifically identified in Table 4.1-2 because they contribute to the street as a City-designated scenic highway.

Potential heights of structures permitted under the TOC Ordinance were taken into account in the analysis for Impact 4.1-3. The TOC program is an optional affordable housing incentive program used by a portion of

applicants. In addition, TOC projects are only allowed on selected properties where at least five dwelling units are permitted by the existing zoning, meaning that single-family and some low-density multi-family properties are not eligible. Height is an additional incentive for TOC projects and is only available to projects that qualify for additional incentives. Height, as an eligible incentive, would allow projects to increase the number of stories by one to three stories, depending on the property's location to a Major Transit Stop; top story stepbacks are required for projects located on lots with a height limit of 45 feet or less. In the CPA, additional height under the TOC program could be used to increase the number of stories by one to three, with most lots only eligible to increase the height of projects by one to two stories based on their distance to a Major Transit Stop. As noted in this Final EIR **Chapter 4.0, Corrections and Additions**, the Hollywood CPIO District includes an affordable housing program that would replace the TOC program for properties within the CPIO District subareas. The affordable housing incentives are tailored to the specific CPIO subareas, and include increased density, floor area, and height for projects that include the required percentage of onsite affordable housing. As noted above, the EIR considered potential heights of structures permitted under the TOC program, which is within the parameters of the affordable housing incentives in the Hollywood CPIO.

Impact 4.1-3 discusses visual character changes expected in various regions of the CPA, including which areas would be expected to have more mid-rise and high-rise buildings over the course of approximately 20 years. In general, mid-rise buildings and high-rise buildings are expected in central Hollywood in the Regional Center land use area, and mid-rise buildings would be expected along selected, larger commercial corridors in the CPA. Additional height that could be used under the TOC program would generally be expected to result in mid-rise buildings. Overall, the expected visual character changes in certain areas of Hollywood would be consistent with the existing visual character of the CPA; see pages 4.1-32 to 4.1-37 for additional information. As concluded in the EIR, the impact of the Proposed Plan is less than significant in terms of whether it would substantially degrade the existing visual character or quality of the site and its surroundings.

The impact questions regarding visual character were adequately analyzed and the commenter does not raise new environmental impacts. As stated on page 4.1-27 of the EIR, the methodology for the Aesthetics section includes an explanation regarding aesthetic impacts as a result of implementation of the Proposed Plan in all areas of the Community Plan Area, including TPAs (Transit Priority Areas) and including development that would qualify for SB 743 exemption for aesthetics. On page 4.1-27, an explanation is provided for Scenic Vistas and Visual Character so that the reader may understand how the impact question was analyzed and discussed in the EIR. Additionally, pages 4.1-29 to 4.1-31 include discussion of various FAR (Floor Area Ratio) scenarios to bolster the discussion of various possible development scenarios under the Proposed Plan.

Consistent with the requirements of CEQA Section 15130, Discussion of Cumulative Impacts, the cumulative impacts section for Aesthetics starts on page 4.1-42 of the EIR and provides adequate discussion about scenic vistas, visual character, and light and glare as required by CEQA. Under CEQA Section 15130(b) "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." One of the elements that CEQA suggests for the discussion of cumulative impacts is citing relevant projects. The EIR cites projects ranging in size and height (up to 21 stories) in the footnotes provided on page 4.1-42 to further illustrate the current construction activity in the context of the foreseeable development expected during the lifetime of the Proposed Plan. Many parcels with a Regional Center Commercial land use designation have unspecified height limits, meaning the height of the project is set by the FAR instead of an absolute number. Entitled and proposed projects in the Regional Center currently range in height and would be expected under the Proposed Plan to range from mid-scale height to 20-something stories typically.

Based on the above, the comment does not identify any new physical environmental impacts nor raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The EIR provided adequate analysis and discussion. No further response is required.

Response 27-4

The comment states that sulfur odors from sewers are a problem observed in the foothills and flats between La Brea Avenue and Fairfax Avenue and that increased density development proposed by the plan would increase sewage and associated odors.

The comment raises concerns about the Proposed Plan's impact on existing conditions regarding sewage and associated odors. For clarification, residents may direct concerns about sewer odor by calling the City's Bureau of Sanitation's 24-hour Customer Care Center at (800) 773-2489.

Los Angeles Sanitation (LASAN) implements various measures to reduce the generation and release of odors from the sewer system, including odor complaint response and investigation; routine sewer maintenance; chemical addition; air withdrawal, treatment, and management; sewer construction and repair; and on-going monitoring of sewer air pressure and odor concentration. LASAN also prepared the 2017 Collection System Odor Control Master Plan which is an annual review and evaluation of the City's on-going collection system odor control program and efforts. According to the master plan, as flows reach the bottom of the Hollywood Hills, the sewer slope flattens causing a hydraulic jump; wastewater velocity decreases due to a flattening of the sewer slope and consequently causes air ejection where odors escape to outside air through pick holes in maintenance hole covers, through vents and other very small openings in the pipeline and connection points. The Proposed Plan does not increase, incentivize, or encourage, new housing in the hillsides and therefore it would not foreseeably substantially exacerbate existing conditions. **See Master Response No. 9 – Hillsides**.

Response 27-5

The comment states that page 4.4-13 of the Section 4.4, Biological Resources, does not mention the high levels of wildlife west of the US-101 in the western Hollywood Hills and that much wildlife movement occurs across streets connecting Hollywood to the Valley. The commenter states that too much development along streets, such as Sunset Boulevard, Hollywood Boulevard, and Franklin Avenue could impact wildlife movement and urban habitats for wildlife. The comment also states that the EIR does not reference the motion passed by Los Angeles PLUM Committee in April 2016 to create a wildlife corridor in the eastern area of the Santa Monica Mountains (between I-405 and US-101) and the City's subsequent Wildlife Pilot Study. The commenter expresses their opinion that the discussion of Impact 4.4 should be amended to include mitigations for the Hollywood Hills west of US-101.

The issue of wildlife movement requires technical expertise, and the comment does not provide substantial evidence that the Proposed Plan would negatively impact wildlife movement. Existing urban streets are already substantially developed, and the motion passed by PLUM in 2016 was to instruct City Planning to prepare an ordinance with a set of land use regulations that would maintain wildlife connectivity in the city, generally in the eastern area of the Santa Monica Mountains. A draft ordinance was released in May 2021, and it has yet to be considered by the City Council. The Proposed Plan includes a few minor changes within the Santa Monica Mountains portion of the Project Area to address existing land use issues by changing the General Plan land use designations and/or zoning to reflect existing uses or to maintain existing neighborhood scale. The Proposed Plan does not increase, incentivize, or encourage, new housing in the hillsides. Please see **Master Response No. 7 – Biological Resources** and **Master Response No. 9 - Hillsides**.

Response 27-6

The comment states that the lack of mitigation to address significant and unavoidable impacts to historic resources is unacceptable. The comment also states that Program 30 of the Community Plan is incorrect because the Sunset Square HPOZ already exists.

Please see **Master Response No. 3 – Cultural Resources** for response to comments related to mitigation associated with Historic Resources. Regarding the Sunset Square HPOZ, it has been removed as a program in the Community Plan; please see Final EIR Updated **Appendix D**, Draft Community Plan.

Response 27-7

The comment states that TOC regulations should be included in the regulatory framework of Section 4.10, Land Use and Planning, of the EIR and notes the same corrections as those in Comment 27-2. The comment also states that the Proposed Plan is in conflict with Objective 3.7 of the General Plan Framework Element because the EIR states that infrastructure and public services improvements would be built as needed rather than included in the Proposed Plan as the commenter suggests the General Plan requires. The comment also states that the Proposed Plan does not include development standards for enhancing neighborhood character in areas outside the CPIO. Similarly, the comment also states that the Proposed Plan is inconsistent with the General Plan because it does not plan for new recreational facilities but the EIR discloses potentially significant impacts related to increased use of existing recreational facilities with no mitigation measures.

The TOC regulations are discussed on page 4.13-8 in Section 4.13, Population, Housing, and Employment of the EIR. Please see **Response 27-2** related to corrections requested for the description of the CPA. Regarding the portions of the comment that are related to consistency with the General Plan objectives, please see **Master Response No. 4 – Infrastructure** related to infrastructure within the CPA.

Regarding neighborhood character, the policies contained in the Proposed Plan are intended to enhance or protect neighborhood character throughout the CPA, including Policies LU1.1, LU1.3, LU1.4, LU1.7, LU2.1, LU2.2, and LU2.5 in Chapter 3 of the Community Plan; see Final EIR Updated **Appendix D**. The Proposed Plan also includes proposed zoning that would preserve and enhance neighborhood character by adding new height limits compatible with existing uses for example.

Regarding the need to create park resources, the costs of acquisition of land and the feasibility of assembling parcels of land for recreational facilities are severe impediments to the provision of parks. However, as stated on page 4.14-52 of the EIR the Quimby Act requires residential developers to dedicate land or pay in lieu fees to help offset potential impacts on existing park facilities from increased use as a result of population growth. As stated in the EIR on page 4.13-53, Los Angeles Recreation and Parks is currently seeking opportunities to expand parkland within the Project Area but has not yet identified specific parcels for acquisition of development. The refinements to the Proposed Plan (summarized in **Chapter 2.0, Modifications and Technical Refinements to the Proposed Plan and Environmental Effects)** identifies new policies and programs to support better trail connections and access to parks and open space resources; however, the City has not identified any feasible mitigation.

Also, please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 27-8

The comment states that rooftop uses such as pools, decks, and restaurants/bars generate excessive noise and development posed by the Proposed Plan will increase such uses and associated noise. The comment also states that noise generated from rooftop uses travels into hillside neighborhoods resulting in impacts to the residential uses, which the EIR does not address. The comment requests a mitigation measure to limit or prohibit rooftop decks within 500 feet of residential and other noise-sensitive uses. Similarly, the comment also states that the EIR fails to address cumulative ambient noise impacts resulting from growth in the CPA.

The EIR states that permanent sources of noise, including rooftop bars, could potentially result in significant impacts dependent on specific project characteristics, including the noise level of the particular noise source, the distance to and from the receiving land use to the source, and existing noise levels. It is not possible to quantify future noise levels at specific locations within the entire Plan Area since the specific sources of noise and location of new development and the sensitivity of adjacent uses are unknown. Mitigation Measure **N3** requires Noise Studies for projects within the CPIO and all discretionary projects within the Plan Area as well as other measures to reduce noise levels on development sites. Limiting or prohibiting all rooftop uses within 500 feet of residentially zoned areas would be overly broad and restrictive in limiting uses of properties within the Plan Area that are desirable and on that basis is infeasible. Some residential projects provide private open space use on rooftops. While difficult to quantify the noise reduction associated with Mitigation Measure **N3** in the absence of specific projects, implementing these conditions would reduce noise levels on most development sites to an acceptable level. However, the Plan Area is within an urban environment focused on the entertainment and tourism industry; it is anticipated that in limited cases noise levels could still exceed thresholds of significance. Therefore, the EIR concludes that the Proposed Plan could result in a significant and unavoidable impact related to operational noise.

As stated on page 4.12-15 of the EIR, the threshold of significance for permanent noise increases indicates that a permanent noise impact would occur if the ambient noise level measured at the property line of affected uses increases by 3 dBA Community Noise Equivalent Level (CNEL) to or within the "normally unacceptable" or "clearly unacceptable" categories, or any 5 dBA CNEL or more increase in noise level. CNEL is an average sound level during a 24-hour period. CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. This accounts for the additional sensitivity of humans for evening and nighttime noises.

As discussed on page 4.12-21 of the EIR, rooftop bars commonly generate complaints. The EIR further indicates, *"[m]any such land uses require conditional use permits that assist in reducing potential impacts to the community. The change in existing noise levels due to new development is highly dependent on specific project characteristics, including the noise level of the particular noise source, the distance to from the receiving land use to the source, and existing noise levels. It is not possible to quantify future noise levels at specific locations within the Proposed Plan when the specific source of noise and location of new development is unknown. It is possible that a land use that has not been planned or developed would result if the ambient noise level measured at the property line of affected uses increases by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories ..."*

The characteristics of noise associated with rooftop pools could depend on whether the pool was associated with a commercial use or a private residential use. New commercial uses would likely be conditioned in much the same way as a rooftop bar. Noise associated with private residential uses would likely be more intermittent.

As indicated by Policy LU8.8 and Mitigation Measure **N3**, the City would require the preparation of noise analysis reports on a case-by-case basis and implementation of feasible mitigation to limit noise impacts. Noise associated with outdoor activities including use of patios and pools is not unexpected or incompatible with an urban environment.

Regarding hillside noise echo, rooftop noise within the foothills or flats may be audible at hillside residences depending on the location of the source and receptor, the generated noise level, and meteorological conditions. However, such noise levels would not exceed the City's significance thresholds. The California Department of Transportation (Caltrans) studied reflective noise in the *Technical Noise Supplements to the Traffic Noise Analysis Protocol* published in September 2013. Caltrans concluded that noise traveling through urban canyons of tall structures typically increase noise levels by less than 3 dBA. Although these studies were conducted for roadway noise, the fundamentals of how soundwaves travel holds true for

stationary sources, such as noise from rooftop bars being heard by neighboring land uses including hillside homes.

Noise generated by rooftop uses would not significantly increase noise levels at hillside residences as the effect of canyons is typically less than 3 dBA. According to Caltrans:

> *"In most cases, the noise increases from reflections are so small that most people do not notice them. The people who do perceive increases in noise are usually suddenly made aware of freeway noise by an event that triggers that awareness (e.g., construction of the noise barrier). Measured increases from noise reflections of more than 2 dBA have never been measured by Caltrans but claims of 10 and even 20 dBA increases have been made occasionally. Many complaints of large increases in noise came come from residents living far from the highway and were actually from changes in meteorology. Atmospheric refraction from wind shear and temperature gradients can account for 10- to 15-dBA variations when the same sources are measured from distances of approximately 1 to 2 miles. To measure the effects of noise reflections, before- and after barrier, noise measurements need to be carefully matched by wind speed, wind direction, temperature gradients, air temperature, humidity, and sky cover. Likewise, if a person perceives a noticeable increase in noise levels from a reflective noise barrier, he or she must be able to compare it mentally with a before-barrier condition that included the same meteorology. Of course, this process is very unreliable."*

Caltrans also discusses the problems with estimating noise levels at receivers at distances greater than 500 feet from the source,

> *With the proliferation of noise barriers in California, public concern has emerged that under certain conditions of topography and meteorology noise barriers can increase noise levels at receivers located from 0.25 to 2 miles from freeways. To date, the concerns have been based on subjective perception only. No objective evidence based on noise measurements has been advanced that noise barriers increase noise levels at any distance or under any conditions other than under the limited conditions described in Section 5.1.7. As indicated, present noise prediction models are not reliable to accommodate distances more than 500 feet. In addition, noise prediction models are unable to predict meteorological effects, which play an increasingly important role in observed noise levels with distance, independent of the nature and strength of their source."*

In the case of noise created by stationary sources, such as rooftop bars, at distant receivers it is often difficult to attribute any particular change in noise level due to the variety of influencing factors such as meteorology or other noise sources. Increases in noise experienced by distant hillside residences is often due to meteorological conditions rather than developments within the Hollywood CPA.

The comment incorrectly states that the EIR does not assess cumulative noise. Cumulative impacts are addressed on page 4.12-27 to 4.12-29 of the EIR. The EIR indicates that construction and operational noise would result in significant and unavoidable impacts.

Regarding construction noise the EIR states on page 4.12-27:

> "Construction noise impacts of the Proposed Plan could add to construction noise impacts associated with cumulative development especially on the periphery of the Plan Area where receptors could be exposed to noise sources from within and outside the Plan Area."

Operational noise would result in a noise impact due to the likelihood that cumulative development at the edge of the Plan Area could combine with the Proposed Plan's development to produce a cumulative stationary source noise impact. The EIR states on page 4.12-28:

> "Significant and unavoidable impacts of the Proposed Plan would add to impacts attributable to cumulative development in the City especially for receptors at the edge of the Plan Area that could be exposed to noise sources from within and outside the Plan Area."

Refer to Mitigation Measures **N3** and **N4** for measures to limit noise exposure.

Response 27-9

The comment states that Section 4.13 should include the same updates or revisions as those requested for Section 3.2. The comment also states that the EIR should not conclude that the Plan's impacts would be less than significant since the Alternatives presented in Chapter 5.0, Alternatives have less of an impact than those disclosed for the Proposed Plan.

Refer to **Response 27-2** for responses related to revisions to Section 3.2.

As discussed on page 5-1 of the EIR, CEQA Guidelines Section 15126.6 requires that:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative* merits *of the alternatives.*

The purpose of the Alternatives chapter is to provide reasonable alternatives that reduce one or more identified significant impacts of a project in order to aid decision makers in weighing the merits of a project against the potential environmental impacts disclosed throughout the EIR.

Alternatives have the potential to result in significant or potentially significant impacts. The commenter provides no substantial evidence that any impact identified as less than significant should be considered potentially significant. Therefore, there is no basis for revisions to impact conclusions within the EIR and no further response is required (CEQA Guidelines Section 15204(c)).

Response 27-10

The comment states that the incident response time in Table 4.14-5 is outdated (2016) and expresses concern about Fire Station No. 41 which serves the hillsides. The comment indicates the opinion that the increased growth along the Sunset Boulevard corridor would have an impact on response time and that this should be analyzed for mitigation. The commenter notes that while CEQA does not require analysis of impacts related to deficiencies in service, the Proposed Plan should at least discuss what impacts might occur and provide programs to address them. The comment also states that the EIR fails to account for tourists and population increases from events in the CPA, noting that tourists and local non-Hollywood residents visiting the Hollywood area also require police services.

Please see **Response 56-21** and **Master Response No. 5 – Emergency Services**.

Response 27-11

The comment requests that the roadway network description be clarified to state that in the Plan Area west of La Brea Avenue, the hillside roadways are north of Sunset and Hollywood Boulevards.

The description of the roadway network on page 4.15-8 of the EIR is intended to provide a high level overview of the Plan Area. There is a small portion of the Plan Area in which Frankin Avenue terminates and the hillside roadways begin north of Hollywood Boulevard and Sunset Boulevard (west of North Curson Avenue). This comment does not affect the environmental impacts or findings reported in the EIR.

Response 27-12

The comment indicates that Figure 4.15-1 shows Fairfax Avenue between Fountain Avenue and Hollywood Boulevard as an Avenue I when it should be shown as an Avenue II.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. Figure 4.15-1 was updated to reflect the correct roadway classification for Fairfax Avenue between Fountain Avenue and Hollywood Boulevard as an Avenue II.

Response 27-13

The comment states that the traffic data is outdated because it was only collected on a Tuesday, Wednesday, and Thursday, which does not reflect traffic conditions when street closures are most likely to occur for special events, and that special events in Hollywood occur on any day, every day, night and day, and year round. The comment further states that traffic conditions cannot be considered mitigated without the correct and complete data.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds in 2019 to comply with SB 743. The impacts concluded in the recirculated Section 4.15 are less than significant and mitigation measures are not necessary. Analyzing traffic impacts during the weekday commute hours when the additional impact of new development will be greatest was found to be the most applicable analysis for the Proposed Plan. The commenter does not provide any substantial evidence as to why the consideration of different days of the week or months of the year would result in different impact findings in the EIR. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 27-14

The comment indicates that Figure 4.15-4 should be updated to show Sunset Boulevard west of La Brea to the City border as four lanes with restricted parking during peak hours and that Hollywood Boulevard also appears to be incorrect in that area.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. Figure 4.15-4 was updated to reflect the correct number of lanes and peak period parking restrictions.

Response 27-15

The comment states that the John Anson Ford Theatres should be included in the description of special events and that the year-round events at the Hollywood Bowl should be acknowledged. The comment also states that impacts due to filming and other street closures should be included in the special event description.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. The discussion of special event operations was updated (see pages 4.15-24 and 4.15-25). Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 27-16

The comment states that the proposed treatment option for La Brea Avenue between Sunset Boulevard and Hollywood Boulevard is not possible with the development that has already occurred.

Refer to **Response 27-2**.

Response 27-17

The comment states that Impact 4.15-2 is not mitigated due to the inaccurate description of special events.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated in 2019 to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. In addition, the discussion of special even traffic operations was updated in the EIR (pages 4.15-24 and 4.15-25). Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 27-18

The comment states that Figures 4.15-8 and 4.15-9 have Crescent Heights mislabeled as Fairfax.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. Figures 4.15-8 and 4.15-9 were updated to correct the roadway labels.

Response 27-19

The comment indicates that the operating conditions reported in Figures 4.15-2 and 4.15-3 do not reflect current conditions in the study area. The comment states that during the AM peak period, Sunset Boulevard through West Hollywood is shown as being acceptable when traffic congestion backs up into Hollywood and that La Brea Avenue is also shown as acceptable when there is often congestion. The comment also states that during the PM peak period, Highland Avenue north of Hollywood Boulevard to Franklin Avenue is shown as acceptable when congestion often occurs, and that Hollywood and Sunset Boulevards are also shown as acceptable in the central part of Hollywood Business District where congestion occurs.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. Although peak period congestion is no longer considered a primary impact area, the potential secondary impacts of the Proposed Plan have been included in the discussion of emergency access to reflect the secondary impacts resulting from increased congestion in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4. The results shown in Figures 4.15-2 and 4.15-3 represent travel conditions during the peak travel periods and not during the worst-case peak hour. Therefore, Figure 4.15-2 is showing average operations during the morning peak period between 7:00 a.m. and 10:00 a.m. and Figure 4.15-3 is showing average operations during the afternoon peak period between 3:00 p.m. and 7:00 p.m. The roadway segments of concern are all just below the 0.90 volume-to-capacity ratio which was used to highlight segments operating acceptably. As part of the recirculated Section 4.15, the volume-to-capacity threshold used to illustrate acceptable operations was reduced from 0.90, which reflects LOS E operations to 0.80 which reflects LOS D operations.

Response 27-20

The comment states that the John Anson Ford Theatres and Universal Studios are not included in the description of special events.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. The discussion of special event traffic operations was updated (see pages 4.15-24 and 4.15-25). Please see **Master Response No. 8 – Transportation & Traffic**.

Response 27-21

The comment states that the traffic data is incomplete because it was only collected on a Tuesday, Wednesday and Thursday, which does not reflect traffic conditions for special events, and that special events in Hollywood occur year-round and up to seven days a week.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. As explained in Section 4.15 (page 4.15-14), the data collection effort for the Existing Conditions assessment included traffic counts recorded by the Regional Integration of ITS Project (RIITS) during the months of February, March, April and May on a Tuesday, Wednesday and Thursday in 2016. Consequently, the count data utilized in the EIR represents a much more robust dataset than the traditional approach of collecting vehicle counts on a single day. Therefore, analyzing traffic impacts during the weekday commute hours when the additional impact of new development will be greatest was found to be the most applicable analysis for the Plan. The commenter does not provide any substantial evidence as to why the consideration of different days of the week or months of the year would result in different impact findings in the EIR. Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 27-22

The comment refers to Tables 4.15-8 and 4.15-9 and states that the EIR reports that traffic conditions with the Proposed Plan are worse than No Project conditions, and that the No Project Alternative is the environmentally superior alternative.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. The specific tables referred to in this comment have been renumbered as Tables 4.15-11 and 4.15-12 and show that the weighted average V/C ratios and corresponding LOS would worsen under future year conditions with the Proposed Plan under both transportation improvement treatment options in comparison to existing conditions. However, no significant transportation impacts would occur under the City's current thresholds which are based on total daily VMT per service population. Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 27-23

The comment expresses concerns with the impact analysis conducted for residential streets and states that the impacts of neighborhood traffic intrusion generated by project-related traffic will not be mitigated. The comment states that Mitigation Measure **T2** is inadequate and should be binding, not "as resources permit." The comment states that the impact conclusion is significant and unavoidable but the commenter states the impacts are significant and unacceptable.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 27-24

The comment states that the mitigation measures identified in the EIR require funding and that a Nexus Study should be completed before the EIR is certified by City Council.

The Nexus Study requested in the comment is included in the EIR as Appendix K. The Transportation Impact Assessment (TIA) Fee Program Study for the Hollywood Community Plan Update was completed in November 2018 and published for 75-day public review and comment in the EIR.

Response 27-25

The comment states that the Plan Update is repeating the practice of inflating population figures, which happened in a previous update and led to that Plan's invalidation. The comment also states that the City's future population estimate is not in concert with SCAG's because the City uses SCAG's estimate as the lower end of the Plan's expected population even though the Census of 2010 showed a decrease in population. The comment states the Plan Update is setting up another lawsuit challenge.

Please see **Master Response No. 2 – Population, Housing and Employment**.

Response 27-26

The comment states that the Cahuenga Pass should be kept clear for emergency access but parcels along the Franklin, Cahuenga, and Highland corridors are being up-zoned. The comment states that Hollywood's Metro stations and Measure JJJ is like putting 10 pounds of mud into a five-pound bag, with the bag being a 15 square block area that is hill bound and fault laden. The comment also states that the Plan Update is incentivizing the demolition of affordable housing for hotel projects.

The Proposed Plan would not result in impacts related to fault rupture, seismic ground shaking, or seismic-related ground failure, including liquefaction and/or landslides as discussed on pages 4.6-15 to 4.6-19 of the EIR's Geology and Soils section. The Proposed Plan's zoning does not include incentives for hotel development, please see Final EIR Updated **Appendix C**, Proposed Change Area Map and Change Matrix.

Response 27-27

The comment states that the Limited Development Alternative is given a different title "Reduced Transit Oriented Development (TOD) and Corridors Alternative." The comment expresses concern that population is overestimated for Hollywood, based on the 2000 and 2010 Census. The comment also suggests that when discussing TODs, language should refer to a 0.5-mile walkshed instead of a 0.5-mile radius, which is more appropriate for urban areas, in accordance with Metro or the Federal Transportation Authority. The comment also expresses concern that the Plan does not adequately address why it is not aligned with Metro and federal guidelines.

Chapter 5.0 in the EIR describes a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or substantially lessen significant environmental impacts while attaining most of the basic objectives of the project. Section 5.4 "Alternatives Considered and Eliminated From Further Evaluation" describe alternatives that were dismissed because they would not achieve most of the primary objectives of the project. As stated on page 5-5, the Limited Development Alternative would adjust the existing development potential downward and limit future development potential. This alternative was eliminated because it "would not accommodate the projected housing, population, and job growth for the Project Area and would not accomplish the underlying purpose of the Proposed Plan and most of the primary project objectives, as it would not direct growth to transit hubs and corridors, balance jobs and housing growth and create employment opportunities, or have regulations to protect designated and eligible historic resources and promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry." The Reduced TOD and Corridors Alternative (Alternative 2) would reduce some identified significant impacts while meeting the underlying purpose and the primary and secondary project objectives in part, however, to a lesser degree than the Proposed Plan. Please see **Master Response No. 2 – Population, Housing and Employment** for population. Using a 0.5-mile walkshed instead of a 0.5-mile radius does not identify a new environmental impact. While a 0.5-mile walkshed captures the actual path a pedestrian would take to walk 0.5 miles, referring to a 0.5 mile radius around a TOD implies a similar concept, especially in urban areas such as Hollywood that have a grid roadway network with pedestrian access and sidewalks on both sides of the roadways within the TOD areas. When considering a particular development, utilizing the walkshed definition is beneficial because it accounts for the pedestrian travel path between the front door of the building and the transit boarding platform or bus stop, and accounts for the true

distance a pedestrian would need to travel to access transit between the time they leave a building and arrive at a transit stop. However, it is appropriate for a planning level study to utilize a 0.5-mile radius to describe TOD proximity in urban areas such as Hollywood. While the two measurements would produce slightly different results, it would not change the impact conclusions in the EIR. The comment is vague in referencing alignment between the Plan and Metro and federal guidelines. Section 4.15, Transportation and Traffic, concludes a less than significant impact for Impact 4.15-1, which asks if implementation of the Proposed Plan would conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The Proposed Plan's objectives are consistent with SCAG's 2016-2040 RTP/SCS and the City's Mobility Plan. Please see page 4.15-35 for more information.

Response 27-28

The comment states that there is heavy traffic in the CPA which causes an air quality impact. The comment also states that the EIR analysis does not account for ride share transportation and delivery services and does not include data on transit ridership declines or increased personal automobile sales. According to the commenter, these conditions need to be analyzed to accurately assess Air Quality impacts. The commenter also states that the Alternatives presented in Chapter 5.0, Alternatives, were not modeled to the same level of detail as the Proposed Plan.

Please see **Master Response No. 8 – Traffic & Transportation** for discussion of the traffic analysis provided in the EIR and **Response 15-8** regarding transit ridership declines and increased automobile sales.

In addition, as discussed on pages 4.3-23 through 4.3-28 potential air quality impacts from vehicles in the CPA were assessed based on estimated regional daily VMT associated with all vehicle trips having origins or destinations within the Project Area. As discussed on page 4.3-35, future daily regional emissions under implementation of the Proposed Plan are generally expected to decrease relative to existing emissions. This trend is primarily attributed to programmed improvements in vehicular engine efficiency technologies and fuel pollutant concentrations, as well as fleet turnover and the addition of more alternative fuel vehicles, which are projected to occur between existing conditions and 2040 resulting from more stringent statewide regulations promulgated by the CARB.[49] Due to improvements in vehicular engine efficiency, and projected VMT throughout the CPA, the EIR concluded that mobile source emissions (vehicle emissions) would not result in a significant impact related to air quality, though potentially significant impacts were identified related to potential VOC emissions resulting from increased development and increased use of consumer products.

Regarding shared mobility and delivery vehicles, the EIR discusses the effects of transportation technologies in the recirculated Section 4.15 (page 4.15-33). As discussed, the transportation analysis approach used in the EIR applies established traffic forecasting tools that have been empirically proven and accepted under CEQA. However, these established traffic forecasting tools may prove to be conservative if higher levels of walking, bicycling, and transit use exceed what is forecast in the EIR resulting in less VMT than forecasted. It is possible, however, that innovations in autonomous and driverless vehicles, transportation network companies (e.g., Lyft and Uber), and same-day delivery will increase future VMT service population. A variety of factors contribute to VMT, and transportation technologies along with demographic trends will influence future travel behavior. It would be speculative to make assumptions about how these new technologies and changes in transportation may affect travel behavior long-term; therefore, the methodologies and travel forecasts applied in this analysis rely on the state-of-the-practice at this time as is accepted under CEQA.

[49] CARB, Mobile Source Analysis Branch, *EMFAC2014 Volume III – Technical Documentation*, May 2015.

Response 27-29

The comment states that the EIR does not describe the Secretary of the Interior's Standards for the treatment of historic resources and further states that the Plan lacks guidance for preservation leaving interpretation of standards to the Office of Historic Resources. The comment also claims that the EIR supports demolition of historic residential structures and provides "possible" protections for historic commercial structures and their attempt to define the historic relevance of different resources. Finally, the comment states that the Plan will encourage development in a one block corridor along Franklin because there is not limitation on development in the area between the Whitely Heights HPOZ and the CRA Hollywood Redevelopment Area.

The Secretary of the Interior's Standards for the Treatment of Historic Properties is a 250-page published guidance document (available at: https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf), that outlines the appropriate treatment of historic properties when engaging in preservation, rehabilitation, restoration, or reconstruction activities. It is not necessary for the EIR to reproduce this guidance document as it is well-known, easily available resource. Locally designated historic resources in the City of Los Angeles are overseen by the Office of Historic Resources and, as discussed on pages 4.5-7 through 4.5-8 of the EIR, projects involving such resources are subject to the City's Cultural Heritage Ordinance (LAAC 22.171) and LAMC Section 91.106.4.5 which among other things require additional levels of building and demolition permit review and application of the Secretary of Interior's Standards independent of the Proposed Plan and EIR. Please see **Master Response No. 3 – Historic Resources** for detailed discussion of the EIR's impact findings related to historic resources and associated preservation policies contained in the Proposed Plan.

Response 27-30

The comment states that the Plan does not protect residents in the CPA from seismic safety concerns associated with the Hollywood and Newport-Inglewood faults discussed in the EIR. The comment also states that the City relies on third party analysis provided by developers to ensure the safety of new development and cites recent news stories of "pay to play" corruption of some City officials.

In accordance with recent case law (related to CEQA requirements to address impacts of a project on the environment and not impacts of existing environmental conditions on a project unless the project would exacerbate those conditions) the impact discussion focuses on whether the Proposed Plan could exacerbate existing environmental conditions. In addition, the potential effects of active faults and seismic ground shaking are also discussed for informational purposes (see the discussions for Impacts 4.6-1 and 4.6-2). While earthquakes of various magnitudes could potentially result in property damage and loss of life, future development are required to comply with up-to-date seismic design requirements of the California Building Code and Los Angeles Building Code to ensure that new buildings are designed to withstand seismic events through modern construction techniques. Additionally, future development located within the Hollywood Alquist-Priolo Earthquake Fault Zone would be required under State law to conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet). Otherwise, issues brought up in the comment pertaining to corruption in the City do not provide substantial evidence supporting the need for new analysis in the EIR or different impact conclusions. Please see also **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 27-31

The comment states that rooftop uses such as pools, decks, and restaurants/bars generate excessive noise and development posed by the Proposed Plan will increase such uses and associated noise. The comment also states that noise generated from rooftop uses travels into hillside neighborhoods resulting in impacts to the residential uses which the EIR does not address, and that call logs from the LAPD were not included in the HCPU2.

Refer to **Response 27-8** for a discussion of rooftop noise.

Response 27-32

This comment states the schools in the CPA are not correctly identified, and the environmental impacts to those schools are not properly evaluated.

As discussed on page 4.14-27 of the EIR, the public services analysis does not consider impacts to private schools; charter schools are addressed in the EIR because they are publicly funded facilities. The CEQA Guidelines Appendix G specifically indicates that impacts to public services (including schools) be evaluated, not private facilities. The public services analysis under CEQA, in accordance with Appendix G of the CEQA Guidelines, assesses if the Proposed Plan would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. Private schools are not government facilities and do not have publicly mandated performance objectives; therefore, the impact criterion for public services does not apply to private schools. The Proposed Plan does not include any direct impacts or changes to Oakwood School or Canyon School. Please also see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 27-33

This comment states that there appears to be no strategy to increase police and fire services in the CPA. The commenter also states that there is no rationale to support the conclusion that impacts related to police and fire services would be less than significant given that the population is forecast to increase by 40,000 persons. The comment also states that that if new police facilities are needed they would be under land use, as stated on page 4.14-26, and states that because the Hollywood division is located in a TOD area, land use is moot because it is all for commercial use and there will be no land left for LAPD or LAFD.

Page 4.14-26 of the EIR in the Public Services section indicates, "if new or expanded police facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use." The discussion then says that new facilities would be anticipated as infill development or in an urban area that would likely have a less-than-significant impact or possibly qualify for an infill exemption. The existing Hollywood Division station located at 1358 North Wilcox Avenue is in central Hollywood, as identified on Figure 4.14-2 of the EIR. It is next to Fire Station No. 27 and the City-owned property also includes ample surface parking for police vehicles. For clarification, page 4.14-26 refers to designated land use and not only land use. Police and fire stations are usually located on government-owned parcels designated with the Public Facilities land use designation, as are schools and other facilities such as libraries. At the existing police facility site, which is designated Public Facilities, there could be an expansion or addition to the current station, although this is speculative at this time, and the new project would be in an urban setting and an infill project that would likely have less than significant impacts. As stated on pages 4.14-22 to 4.14-23 police units are often in a mobile state and LAPD uses "Patrol Plan," a field deployment software to respond to the need of increased demand associated with new development and/or population growth. Please also see **Master Response No. 5 – Emergency Services**.

Response 27-34

The comment states that Franklin and Outpost in Area 3 are over capacity during peak hours (Figures 4.15-8 and 4.15-9) and that the intersections will not be shown as getting worse because they are already overcapacity. The comment also states that the Proposed Plan does not look to alleviate traffic in these emergency corridors and disproves itself to the General Framework of the City by ignoring mobility into the Caheunga Corridor for all City residents.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to compy with SB 743. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts of the Proposed Plan have been included in the discussion of emergency access to reflect the secondary impacts resulting from increased congestion in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4. While the figures presented in Section 4.15 illustrate roadway operations based on three general categories (Acceptable Operations, Approaching Capacity, and Over Capacity in Figures 4.15-2, 4.15-3, 4.15-8, 4.15-9, 4.15-10, and 4.15-11), the existing and expected changes to the roadway volume-to-capacity (V/C) ratios were calculated to determine the change in the V/C ratios shown in Tables 4.15-11 and 4.15-12. As shown, with the implementation of the Proposed Plan under both treatment options and regional growth anticipated in Year 2040, the weighted V/C ratio continues to worsen under LOS E operation during the AM peak hour and LOS F operation during the PM peak hour.

Regarding the Proposed Plan's connection to the General Plan Framework Element, the Proposed Plan would improve the link between the locations of land use and transportation in a manner that is consistent with the Mobility Plan 2035 and the General Plan Framework Element as discussed in Impact 4.15-2 of the EIR. Implementation of the Proposed Plan would create new housing and employment opportunities, mostly in areas around existing transit systems, where additional mixed-use development is expected. This is in accordance with the Framework Element's guiding policy to focus growth in higher-intensity commercial centers close to transportation and services. Consequently, the Plan is supporting the implementation of the City's Framework Element and is not in conflict with the Framework Element.

Response 27-35

The comment is regarding the relationship between the Proposed Plan's transportation system and the City's Mobility Plan 2035. The comment asks why the Proposed Plan's transportation system could be impacted by the City's Mobility Plan as stated on page 4.15-63, and if the Proposed Plan's transportation could take precedence over the Mobility Plan 2035.

As discussed in Section 4.15 on page 4.15-7, the Mobility Plan 2035 (formerly the Transportation Element of the City's General Plan) was adopted in 2015 and amended in 2016, and is the transportation blueprint for the City of Los Angeles. Mobility Plan 2035 provides the framework for future community plans and specific plans, which take a closer look at the transportation system in specific areas of the city and recommend more detailed implementation strategies to realize Mobility Plan 2035. The proposed plan contains a Project List (Table 4.15-7) that reflects the vision of Mobility Plan 2035. The reference to full buildout of Mobility Plan 2035 in the cumulative impacts discussion of Section 4.15 (pages 4.15-60 and 4.15-61) is regarding the implementation outside of the proposed Plan Area. Within the Plan Area, the vision of Mobility Plan 2035 is reflected in the impact analysis and in the Project List of the proposed plan.

LETTER NO. 28

George Skarpelos, President
Jim Van Dusen, Chair, Planning and Land Use Management Committee
Certified Neighborhood Council #52
P.O. Box 3272
Los Angeles, CA 90078

Response 28-1

The commenter requests a 30-day extension to review the EIR due to the holidays and because the Brown Act precludes the Hollywood United Neighborhood Council from discussing the EIR outside of regular board and committee hearings. The commenter states that the letter does not contain all the comments from

the Hollywood United Neighborhood Council and that the neighborhood council will be providing more comments soon.

Section 15105(a) of the CEQA Guidelines states that the public review period for a Draft EIR should not be less than 30 days and not longer than 60 days, except in unusual circumstances. When a Draft EIR is submitted to the State Clearinghouse for review, the public review period for a Draft EIR should not be less than 45 days. Due to the holidays, the EIR was available for public review for 75 days, which is longer than the maximum review period stated by the CEQA Guidelines. The public review period opened on November 15, 2018 and closed on January 31, 2019.

Upon receipt of the extension request, City Planning replied that "for those comments submitted up to two weeks after the comment period closes, the City may include those comments and written responses in the Final EIR, subject to available resources and the comment raising new issues. In any event, all comments submitted on the Draft EIR, including those marked late, will be made part of the administrative record and, as required by the California Environmetal Quality Act (CEQA), will be considered by the City Council prior to taking action on the Final EIR and the Hollywood Community Plan Update." No further comments about the EIR were submitted within the two weeks by the Hollywood United Neighborhood Council.

Responses 28-2 to **28-10** below address specific comments on the Proposed Project and the environmental analysis in the EIR.

Response 28-2

The comment states that while the ruling in *CBIA v. BAAQMD* held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on future residents or users of a project, the commenter expressed its opinion that the potential impact of earthquakes of various magnitudes must be considered in the EIR.

While the impact discussion focuses on whether the Proposed Plan would exacerbate existing environmental conditions, the potential effects of active faults and seismic ground shaking were also included for informational purposes (see the discussions for Impacts 4.6-1 and 4.6-2). Although earthquakes of various magnitudes could potentially result in property damage and loss of life, future development are required to comply with up-to-date seismic design requirements of the California Building Code and Los Angeles Building Code to ensure that new buildings are designed to withstand seismic events through modern construction techniques. Additionally, future development located within the Hollywood Alquist-Priolo Earthquake Fault Zone would be required under State law to conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).

Response 28-3

The comment states that the City should consider including a Hollywood-specific emergency plan in the Proposed Plan due to seismic conditions, poor ingress/egress in the hillside areas, tourism, and liquefaction concerns.

Please see **Response 18-1** and **Master Response No. 5 – Emergency Services**. The comment is noted and will be forwarded to the decision makers for their consideration prior to taking any action on the Proposed Plan.

Response 28-4

The comment states that the affordable housing incentives and requirements are inadequate and that the Plan should increase affordable housing beyond what the proposed zoning requires.

Please see the proposed zoning and Community Plan regarding affordable housing in the Final EIR Updated **Appendix C**, Proposed Change Area Map and Change Matrix and Final EIR Updated **Appendix D**, Draft Community Plan for additional information. This comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 28-5

The comment states that increasing the FAR to 6:1 is excessive and would affect the ability of traffic, road usage, and infrastructure to be handled safely. The comment also states that a maximum FAR range of 4:1 to 5:1 is more appropriate.

The Proposed Plan does not increase the base zoning of properties to a 6:1 FAR. Under the Proposed Plan, properties with a Regional Center Commercial land use designation could seek additional floor area through an affordable housing incentive system or through the discretionary review process, which is the existing entitlement procedure currently in effect. As stated in Section 4.6, Geology and Soils, seismic safety is addressed by building and seismic codes and future development within the Earthquake Fault Zone would be subject to project-specific foundation and structure studies and imposition of structure design standards to reduce structure failure during a fault rupture. Development will be required to adhere to up-to-date seismic design requirements of the California Building Code and the Los Angeles Building Code, which ensure new buildings are designed to withstand seismic events through modern construction techniques. The type of development expected to occur under the Proposed Plan is typical of urban environments and would not involve mining operations and future development would not exacerbate existing seismic conditions in the Project Area. The commenter's opinions with respect to increasing FAR are noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan; see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 28-6

The comment states that the EIR should include other alternatives such as an alternative with a decreased population with downzoning. The comment also states the Plan fails to acknowledge the increase of new one-bedroom and studio units in Hollywood that are not conducive to families.

EIR Alternative 2 (Reduced TOD and Corridors Alternative) has less development potential for housing and population than the Proposed Plan. Compared to the Proposed Project, this Alternative reduces the allowable base FAR in selected subareas in the Regional Center and the allowable base FAR along selected corridors, and also reduces the proposed density of selected High Medium Residential subarea. However, a project alternative that includes overall reduced development potential, as recommended in the comment, would not meet the underlying purpose of the Project to plan for and accommodate foreseeable City growth in the Hollywood CPA, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of SB 375 and SCAG's Sustainable Communities Strategy. Therefore, it is not considered a viable project alternative. Demographics data indicates that about 60 percent of the households in the CPA are non-family households, and a large percentage of these non-family households are people living alone. Nearly 90 percent of the households in the CPA consist of three or fewer persons, according to the recent 2019 American Community Survey 5-year data. About 47 percent of all households are made up of one person; about 33 percent of the households consist of two persons; and about 10 percent of households have three persons. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 28-7

The comment states that the street designation for Beachwood Drive should be changed from Collector Street to Local Street Limited.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. The recommended amendment will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive. The comment is noted and will be forwared to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 28-8

The comment states that the HCPU should include the option of land swapping for privately owned parcels with City owned parcels to create more parks and parking structures.

Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The Hollywood Community Plan encourages the preservation and enhancement of open space and park space within the Community Plan Area; see Chapter 4: Public Realm, Parks, and Open Space of the Community Plan. Proposed policies include supporting the establishment of joint-use agreements with public and private entitles to increase recreational opportunities in Hollywood. In addition, the Partnership Division of the City's Department of Recreation and Parks is tasked with identifying partnerships and support resources that will facilitate the Department's ability to enhance and expand existing programs and services; please see the City's Health and Wellness Element, also known as the Plan for a Healthy Los Angeles. Parking is not a CEQA impact, see **Master Response No. 1 – General Comments and Non-CEQA Issues**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 28-9

The comment states that more information regarding bus transit routes and frequency should be included in the EIR and that the Plan should include dedicated bus lanes on congested streets to increase ridership. The comment also suggests there should be free bus lines within the heart of Hollywood.

The improvement concepts related to additional transit service and frequency and dedicated bus lanes requested in this comment are included in the Proposed Plan. Section 4.15 of the EIR describes the existing transit service in the Plan area on pages 4.15-20 through 4.15-22, Figure 4.15-5 shows the transit service routes and daily ridership by transit stop, and transit improvements are summarized in the Project List in Table 4.15-7. In addition, Goal M.4 of the Draft Community Plan states "A comprehensive transit system that provides safe and efficient access to, around and from Hollywood that minimizes automobile dependence" and is supported by 16 policies related to transit in the Plan Area.

Response 28-10

The comment provides a statement that the Proposed Plan needs to better address homelessness and affordable housing with more specific direction. The comment also states that social or economic effects of displacement of low-income residents are not addressed in the EIR. The comment suggests that the City Council should develop new incentives to increase affordable housing.

Please see **Master Response No. 6 - Affordable Housing**.

LETTER NO. 29

Tara Stephenson-Fong, President
Alexa Williams, Vice President
Hollywoodland Homeowners Association

Response 29-1

The comment introduces the Hollywoodland Homeowners Association and the Hollywoodland community. The comment describes existing concerns and problems in Hollywoodland, including a lack of code enforcement, substandard streets, public safety, traffic intrusion, vulnerability to fire, limited ingress and egress, short-term rentals, and undesired tourism access to the Hollywood sign, including unsanctioned development of park entry points into Griffith Park. The comment requests that Hollywoodland be restored to its R1 residential status and not be used for entertainment tourism.

The comment refers to the existing physical environment and does not raise or identify any new significant environmental issues associated with the Proposed Plan or address the adequacy of the analysis included in the EIR. Nothing in the Proposed Plan encourages, incentivizes or will result in development or tourist activity or exacerbate any of the conditions raised in Hollywoodland. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**. For inquiries on zoning compliance and code enforcement, please contact the Department of Building and Safety (LADBS). LADBS includes a Code Enforcement unit, which can be reached at (213) 473-3231; the website is ladbs.org/services/core-services/code-enforcement. Please refer to the discussion of Fire Hazards and Emergency Response Plans in Section 4.8, Hazards and Hazardous Materials, of the EIR. Impact 4.8-7 on page 4.8-44 concludes that the impact of the Proposed Plan interfering with an adopted emergency response plan or emergency evacuation plan is less than significant. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Responses 29-2 to 29-16

The comment provides a list of 15 requested issues to address in Hollywoodland as part of the Proposed Plan, including a lack of code enforcement, restoration of historic walls and native plantings, access to the Hollywood Sign, limited ingress and egress, and limiting the use of the Lake Hollywood Park as a neighborhood park. The comment also states concerns about wildlife documentation, drug rehab centers in residential communities, and environmental damage resulting from the promotion of the Hollywoodland Gifted Park area in communications materials.

Refer to **Response 57-3** related to the biological impacts and analysis in EIR of existing species that live and travel in Plan Area. All of these comments will be provided to the City Council for its consideration prior to approval of the Proposed Plan. The comment requests additional policy and implementation changes related to issues in Hollywoodland as noted above but does not include substantial evidence and does not raise specific concerns supporting the need for new or additional analysis or conclusions in the Draft EIR. See **Master Response No. 9 - Hillsides**. Nothing about the Proposed Plan will encourage, incentivize or directly result in development in the Hollywoodland area.

Response 29-17

The comment states that the Lake Hollywood Park area was part of the Gifted Park area given to the City and showing an image of the Hollywood sign misrepresents the Lake Hollywood Park area, which was meant to serve the immediate community, not tourists. The comment states the parking here is limited and the streets are substandard. The comment also states there are two "bootlegged vistas" in the park, and requests the City to retain this area as residential use and not for recreational/commercial zoning.

Refer to **Response 57-5**.

Response 29-18

The comment refers to scenic vistas in the EIR and states there are no official vistas in Hollywoodland but there are "bootlegged" sites and the public is coming to the area despite it being a residential area with substandard streets in a very high fire hazard severity zone. The comment states that visitors are standing on private residential property to see the Hollywood sign and private properties should be protected.

Refer to **Response 57-6**.

Response 29-19

The comment states that Hollywoodlanders are concerned about the probability of a sweeping wildfire in the area, and gridlock from factors such as limited ingress/egress and growing density in Hollywood. The comment states that the Proposed Plan does not address the current traffic congestion. The comment also states that the bulk of residents evacuating Hollywoodland would take Beachwood down to Franklin but Franklin is often gridlocked heading to the US-101 Freeway, and expresses concern that evacuation would be ineffective. The comment states that before considering the Proposed Plan, the current traffic flow should be improved to address concerns with current emergency response and emergency evacuation.

The Proposed Plan does not incentivize or induce development in the hillsides. Please see **Master Response No. 9 – Hillsides** and **Master Response No. 5 – Emergency Services**.

Response 29-20

The comment is regarding neighborhood traffic instrusion and states that the Plan would have an impact to neighborhood streets as identified under Impact 4.15-3 in the EIR. The comment also states that the designation of Beachwood Drive as Collector Street is incorrect because the street characteristics do not meet the definition of a Collector Street and requests that Beachwood be removed from all maps in the EIR.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to compy with SB 743. The impacts concluded in the recirculated Section 4.15 are less than significant and mitigation measures are not necessary. Please see **Master Response No. 8 – Transportation & Traffic**.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. The recommended amendment will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 30

Sarajane Schwartz
Homeowners on Beachwood Drive United (HBDU)

Response 30-1

The comment states that the designation of Beachwood Drive as a Collector Street is incorrect because the street characteristics do not meet the definition of a Collector Street in the Hollywoodland area and requests that Beachwood Drive be removed from all maps in the EIR. The comment states that Beachwood is a substandard hillside street. The comment also states that because the EIR did not seem to consider hillside streets and hillside street standards, the public comment period needs to be extended. In addition, the comment states that Beachwood Drive was acknowledged as a substandard street by the developers that constructed the roadway in the early 1920's in a handwritten notation.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. This commenter, as well as other Hollywoodland and Beachwood Drive residents, provided comment letters on hillside street standards. Please see the Comment Letters 82 through 112.

Showing or not showing a street label in the Plan is a mapping exercise and does not change the functionality of that street. The comment does not state how the changes to street designations would have changed the analysis results or impact conclusions in the EIR. Please refer to **Response 29-20** for information about the redesignation of Beachwood Drive.

Response 30-2

The comment states that the previous draft of the Hollywood Community Plan was defeated in court due to faulty numbers and statistics. The comment also urges the City to adopt the recommendations provided in Comment 30-1 to avoid future legal challenges of the EIR citing safety concerns brought up.

Please see **Response 30-1** and **Master Response No. 2 – Population, Housing, and Employment**.

LETTER NO. 31

Sarajane Schwartz
Homeowners on Beachwood Drive United (HBDU)

Response 31-1

The comment states that the EIR description of Griffith Park on pages 4.1-14 and 4.1-29 are inaccurate, misleading, and dangerous. The commenter indicates that the EIR mischaracterizes the western portion of Griffith Park stating that it has been planned to be and left passive primarily as an animal reserve, while the eastern side of the park is developed and has attractions.

The descriptions of Griffith Park and the Hollywood Sign in Section 4.1, Aesthetics, of the EIR are to describe and discuss the impacts of the Proposed Plan as it relates to visual character, views and vistas, and scenic resources. The Hollywood Sign is mentioned in the section because it contributes to the visual character of the CPA, is a notable focal view, is one of many scenic resources within the CPA and is a City-designated HCM. Potential impacts of development in the undeveloped areas of Griffith Park are discussed in detail in Section 4.4, Biological Resources, of the EIR.

The majority of Griffith Park is undeveloped and has been designated as a SEA (see page 4.4-11 of the EIR), in addition, Griffith Park is designated by the City as a regional park (see page 4.14-44) and contains areas that are used for recreation, as well as areas with undeveloped open space areas. While the developed portions of the park are primarily located on the west side of the park, the undeveloped portions of the park have various designated hiking trails that are used by visitors of the park as a form of recreational activity. Although access to the Hollywood Sign is not available, it is one of the few man-made structures in the undeveloped portions of the Park, and views of the sign are available at some of the designated hiking trails.

On page 4.1-29 of the EIR does not state that the Hollywood Sign would be maintained for recreational use. Rather, the sentence states that the Hollywood Sign is located in Griffith Park, and Griffith Park would be maintained as a regional park for recreational use.

Response 31-2

The comment states that the Hollywood Sign is not a public attraction and was meant to be seen and experienced from afar. The commenter expresses disagreement with grouping the Hollywood Sign with the Griffith Observatory and Los Angeles Zoo. The comment further states that public access to the Hollywood Sign has been questionable, problematic and dangerous. The comment also states residential streets in

Hollywoodland near the Hollywood Sign get dangerously congested with vehicles and pedestrians and could easily be cut off in a wind driven fire.

While no public access to the Hollywood Sign is available, the EIR considers the Hollywood Sign as part of the developed portions of Griffith Park because it is a man-made structure that has been developed in Griffith Park (see **Response 31-1**). Section 4.1, Aesthetics, on page 4.1-8 describes the Hollywood Sign as an object that draws focal views, and views of the sign are available at various publicly accessible locations within the CPA.

The commenter describes existing conditions and their issues with the Hollywood Sign and does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Please see **Master Response No. 9 – Hillsides** and **Master Response No. 5 – Emergency Services** related to the comment's concerns with hazards in the hillside areas.

Response 31-3

The comment states that there is an existing homeland security/terrorism issue at the Hollywood Sign.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 5 – Emergency Services**. Please also refer to the discussion of Emergency Response Plans in the EIR in Section 4.8, Hazards and Hazardous Materials, on page 4.8-35. Impact 4.8-7 on page 4.8-44 concludes that the impact of the Proposed Plan interfering with an adopted emergency response plan or emergency evacuation plan is less than significant. The comment fails to cite to any substantial evidence to support its conclusions and does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 31-4

The comment states that the Hollywood Sign must be removed from the list of "developed" public attractions in pages 4.1-14 and 4.1-29 of the EIR because it is not a public attraction. The comment states this comment would also apply to future plans of Hollywood Sign development in or near Hollywoodland, which is an extremely limited and vulnerable hillside residential community.

The EIR does not identify the Hollywood Sign as a public attraction. Rather, the EIR states that the Hollywood Sign is located in Griffith Park, and Griffith Park is a regional park with recreational uses. Additionally, the Hollywood Sign is a man-made structure that was developed in Griffith Park. See **Responses 31-1** and **31-2**. Aside from two Administrative Change Areas in Griffith Park to ensure that the zoning is consistent with the Open Space General Plan Land Use designation, the Proposed Plan does not propose any changes to the Hollywood Sign and the areas in or near Hollywoodland.

Response 31-5

The commenter asks whether a 30-day extension to the EIR comment period would happen.

The commenter received a reply from City Planning stating, "Per the Notice of Availability, the public comment period on the Draft EIR was from November 15, 2018 to January 31, 2019 by 5:00 p.m. Comment letters received after January 31, 2019 will be marked late. For comments submitted up to two weeks after the close of the comment period, the City may include those comments and written responses in the Final EIR, subject to available resources and the comment raising new issues. In any event, all comments submitted on the Draft EIR, including those marked late, will be made part of the administrative record, and, as required by the CEQA, will be considered by the City Council prior to taking action on the Final EIR and

the Hollywood Community Plan Update." The commenter did not provide any additional EIR comments within two weeks of the close of the comment period.

LETTER NO. 32

Edgar Khalatian
Mayer Brown LLP
350 South Grand Avenue, 25th Floor
Los Angeles, CA 90071

Responses 32-1 to 32-3

The comment indicates that the commenter represents the owners of several properties in the Hollywood Community Plan Area and requests an addition of a property to Subarea 4:5L. The comment notes that portions of properties along Vine Street are included in Subarea 19 but the remaining portions west of Vine are left out. The comment requests unified land use and zoning.

Changes to Subarea 4:5L and Subarea 19 were made; please refer to the CPC-2016-1450-CPU Staff Report and Exhibits. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 33

Lucille Saunders, President
La Brea-Willoughby Coalition
843 North Detroit Street
Los Angeles, California 90046

Response 33-1

The comment provides an introductory summary of comments which state that the EIR did not objectively evaluate or consider all facts and evidence regarding the Proposed Plan and that the Plan's focus is to increase business for the building industries rather than the stated objectives of the Plan. The comment summarizes the concern in the introductory body of the email as follows: "The Report however did not 1) minimize adverse impacts; 3) (*sic*) adequately plan for increases to housing supply; 4) encourage better balance of jobs and housing with mixed development; 5) accommodate commercial uses for future employment opportunities, and 6) especially does not preserve neighborhoods and open space.

Please see **Responses 33-2** through **33-13**.

Response 33-2

The comment provides a summary of the La Brea Willoughby Coalition's focus and other general concerns related to Hollywood and does not raise a specific concern related to environmental issues covered by CEQA.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 33-3

The comment states that the cumulative analysis is not adequately presented in the EIR but does not provide specifics or other evidence.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 33-4

The comment states that the EIR generally disclosed that impacts were "insignificant" and that those impacts disclosed as "significant" were considered unavoidable impacts without mitigation to address the impact. The comment goes on to provide the example of Impact 4.9-2, groundwater supplies, stating that the EIR provided no discussion of impacts resulting from development increases.

The comment does not provide any evidence to support revising any of the conclusions presented in the EIR, nor does the comment indicate what information related to groundwater supplies may be missing from the EIR. The EIR discusses groundwater impacts on pages 4.9-23 through 4.9-24. See **Master Response No. 1 – General Comments and Non-CEQA Issues**.

The EIR identifies 18 individual environmental impacts across the various environmental resource areas that are identified to be significant or potentially significant impacts. The following impacts would remain significant after mitigation: 1) Air Quality (construction and operational emissions), 2) Biological Resources (special status species, riparian habitat, wetlands, migratory wildlife), 3) Historical Resources (impacts to historic buildings), 4) Noise (construction and stationary noise during operation, and vibration); and 5) Public Services (impacts to existing parks and recreational facilities). Mitigation measures were identified for all but two significant or potentially significant impacts (impacts to historical resources and impacts to existing parks). See Chapter 2.0, Summary, of the EIR, specifically Table 2-2 on pages 2-8 to 2-46.

Response 33-5

This comment states that infrastructure in the CPA is only generally described and that the EIR fails to describe or address the area's current deteriorating infrastructure and public service needs.

Please see **Master Response No. 4 – Infrastructure** and **Master Response No. 5 – Emergency Services**.

Response 33-6

The comment states that a primary objective to "correct land uses" around transit systems, corridors, and centers is intended to increase zoning and buildings. The comment expresses an opinion that the basis for these increases are not explained and that potential adverse impacts were not explored.

The Proposed Plan is described in Chapter 3.0, Project Description, and the Project Objectives are identified under Section 3.5, Project Objectives, on pages 3-13 and 3-14. Primary objectives include accommodating projected growth, directing growth away from low-density neighborhoods, providing a range of employment opportunities, and protecting historical and cultural resources. One of the secondary objectives is to maintain land use and zoning consistency. The environmental impacts are summarized in Table 2-2 and evaluated throughout the EIR. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan; see also **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 33-7

The comment states that the EIR's reliance on SCAG data is questionable given previous issues with population growth associated with the Hollywood Community Plan Update. The comment also states that there is already enough housing and development in the CPA to support the projected population and questions the efficacy of TOC developments given the low affordability, lack of high paying employment in the TOC areas, and poor transit service.

Please see **Master Response No. 2 – Population, Housing, and Employment**. Regarding the efficacy of TOC regulations, the commenter is stating their opinion and does not present evidence supporting the need

for different analysis or otherwise raise new significant impacts not already disclosed in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 33-8

The comment states that the transportation and traffic elements of the Plan should be addressed in the EIR and that the traffic studies in the report are faulty in methods, days, times, and comparative numbers.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. The methodology used to analyze the Proposed Plan is also provided in Section 4.15 on pages 4.15-28 through 4.15-39 and further detailed in the Hollywood Community Plan Area Model Development Report contained in Appendix J of the EIR. As explained in Section 4.15 on page 4.15-14, the data collection effort for the Existing Conditions assessment included traffic counts recorded by the RIITS during the months of February, March, April and May on a Tuesday, Wednesday and Thursday in 2016. Consequently, the count data utilized in the EIR represents a much more robust dataset than the traditional approach of collecting vehicle counts on a single day. Please see **Master Response No. 8 – Transportation & Traffic** for additional context as to why vehicular circulation impacts can no longer be mitigated in urban areas, such as Hollywood, and how this has led to the adoption of new CEQA Guidelines in early 2019 to comply with SB 743.

Response 33-9

The comment states that affordable housing development is not being maintained, new projects are not affordable, and that the lack of affordable housing causes the direct and indirect displacement of middle income/middle age residents moving out of the City. The comment also states that the Plan would escalate the elimination of RSO units and would not create middle-income jobs, which has caused increase in homeless.

The commenter has not identified how additional requirements for affordable housing would reduce any of the significant and unavoidable impacts identified in the EIR to a less than significant level. The Hollywood CPIO includes a permanent affordable housing incentive system; the demolition of RSO units requires replacement units in the new project. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Please also see **Master Response No. 6 - Displacement and Affordable Housing**.

Response 33-10

The comment states that the Plan's goal of preserving single-family neighborhoods and open space is countered by attempts to rezone single-family areas and that quality of life factors were not calculated by the Plan. The comment also cites visual impacts presented by existing and planned over height developments.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**. Regarding visual impacts, please see **Response 27-3**.

Response 33-11

The comment references text on page 2-5 of the Draft Hollywood Community Plan, that states "to evolve, neighborhood protections have been established to balance residents' needs." The comment states that the Proposed Plan seems to offer by right privileges with little or no public input. The comment also states that the design of new projects seem to be boxy, over height, and cramped.

The full text referenced on page 2-5 is part of a paragraph under a subtitle called Recent Development. The paragraph reads: "At the same time, as Hollywood continues to evolve, neighborhood protections have been established to balance residents' needs. Since the last plan update, the SNAP, HPOZs, and baseline and

hillside mansionization regulations have been established to maintain and preserve Hollywood's stable neighborhoods." Opportunities for public input on the Proposed Plan have been continuous since the EIR Scoping meeting held in the spring of 2016. A series of public meetings were held in Hollywood in the summer of 2017. As posted on the Plan update's website and included in the Notice of Availability, in 2018 and 2019, DCP staff hosted webinars online, visited farmers markets, and attended meetings organized by community stakeholders. During the COVID-19 pandemic in 2020, planning staff presented at Neighborhood Council planning and land use committee meetings and other stakeholder meetings, and hosted virtual office hours and webinars. The public hearing was held on December 9, 2020 via Zoom. Residents, property owners, and other stakeholders have continuously provided written comments and requests, including during the public hearing comment period, which ended on December 16, 2020, and to the City Planning Commission. Please see the Staff Report for CPC-2016-1450-CPU regarding public comments and also see **Master Response No. 1 – General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 33-12

The comment states that the Proposed Plan identifies the need for open space but there are pictures of alleys being re-framed as open space. The comment also states that roof decks are noise nuisances and must not be allowed. The comment states that pictures in the Plan show Crossroads and Capital Records enhancing the character of Hollywood but do not show the renderings of proposed towers that will overshadow the distinctiveness of the City. The comment also states that state-identified earthquake faults are dismissed by city planners.

The Plan provides a variety of pictures of open space and public space in Chapter 4: Public Realm, Parks, and Open Space of the Draft Community Plan. The selection of a picture or pictures in a draft policy document does not identify any new physical environmental impact. Other comments raised refer to topics that were adequately analyzed in the EIR, under the Noise, Aesthetics, and Geology and Soils sections.

The impact of ambient noise levels increasing for operational stationary resources as a result of implementation of the Proposed Plan was concluded to be significant and unavoidable. Mitigation Measure **N3** on pages 4.12-22 and 4.12-23 of the EIR would help reduce noise levels but in limited cases noise levels could still exceed thresholds of significance, please see pages 4.12-20 to 4.12-24 of the EIR. See also **Response 27-8** regarding rooftop noise. The analysis and discussion under Section 4.1, Aesthetics, concluded that the Proposed Plan's impact on substantially degrading the existing visual character was less than significant, please see pages 4.1-32 to 4.1-38 of the EIR.

As stated in Section 4.6, Geology and Soils, of the EIR, there is a comprehensive regulatory framework implemented at the state and city levels to mitigate potential hazards associated with geologic and soils conditions, independent of the CEQA process. Existing regulations govern the design-controllable aspects of building foundation support, protection from seismic ground motion, and soil instability and compliance is mandatory, please see pages 4.6-14 to 4.6-23 for the analysis and impact conclusions. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 33-13

The comment is a general conclusion to the comment letter stating that greater consideration needs to be given to existing and potential impacts related to infrastructure, emergency services, special event closures, and public services.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**, **Master Response No. 4 – Infrastructure, Master Response No. 5 – Emergency Services**, and **Master Response No. 8 – Transportation & Traffic**.

LETTER NO. 34

Doug Haines
The La Mirada Avenue Neighborhood Association of Hollywood
P.O. Box 93596
Los Angeles, CA 90093

Response 34-1

The comment states that Hollywood is not significantly growing and the Plan is not needed to accommodate population trends. The comment states that the EIR continues to advocate for up to 58,000 additional persons by the year 2040, but population in Hollywood has declined from the 1990 to 2000 Census and from the 2000 to 2010 Census. The comment states that population losses occurred in census tracts adjacent to Metro subway stops and that Metro ridership in the County has declined.

Growth is anticipated for the Community Plan Area and the City of Los Angeles by the SCAG, but at a slower regional pace than previously projected. Please refer to Appendix B, Methodology of the EIR and **Master Response No. 2 – Population, Housing, and Employment**. Please also refer to **Response 15-8** for additional information on transit ridership. The comment does not identify any new physical environmental impact. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 34-2

The comment states that the Proposed Plan and EIR sidestep issues related to infrastructure capacity and health and safety concerns. More specifically, the comment highlights that density increases are proposed near the US-101 which will result in health impacts to future residents, and that many areas proposed for density increases have high crime rates, traffic congestion, and a lack of parks and open space.

Reducing community exposures to pollution from high-volume roadways is a subject that has garnered substantial regulatory attention from the California Air Resources Board (CARB) and the regional air quality districts, and considerable research has been conducted to evaluate methods to reduce exposures of sensitive receptors to mobile source pollution. One of the methods that CARB recommends to reduce indoor exposures to roadway source air pollution is the installation of high-efficiency filtration units in controlled air ventilation systems. The City of Los Angeles requires that all new mechanically ventilated buildings within 1,000 feet of a freeway have ventilation systems outfitted with filtration devices achieving at a Minimum Efficiency Reporting Value (MERV) of 13 (City Ordinance No. 184245 – LAMC Section 99.04.504.6), which CARB research indicates are capable of removing up to 90 percent of particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Design of new residential units permitted within 1,000 feet of the 101 Hollywood Freeway would be required to comply with the ordinance, as well as other provisions of the Los Angeles Green Building Code related to air ventilation and outdoor air infiltration though the building envelope.

Another important element to consider regarding potential future exposures of residents within the Hollywood Community Plan Area to air pollution from the nearby freeway is that regional air quality is improving over time, and mandated advancements in fuel efficiency and alternative fueled vehicles will reduce aggregate fleet average pollutant emissions from mobile sources in the future. The trend of decreasing pollutant concentrations in the Los Angeles area has been documented for some time, especially as evidenced in the SCAQMD Multiple Air Toxics Exposure Study (MATES) reports. Using the regional toxic air contaminants emissions inventory and monitored concentrations at 10 locations throughout its

jurisdiction, the SCAQMD determined that the population-weighted average carcinogenic risk within the South Coast Air Basin decreased by approximately 57 percent (from 853 per million to 367 per million) between the 2002–2004 monitoring period (MATES III) and the 2012–2013 monitoring period (MATES IV). As the regional vehicle fleet turns over and older vehicles are replaced with newer ones, improvements to fuel efficiency and engine technologies will continue to result in decreases in ambient carcinogenic risk throughout the South Coast Air Basin and the City of Los Angeles.

Furthermore, the Air Quality analysis within the SCAG Program EIRs for the two most recent RTP/SCS addressed the forecasted reduction in carcinogenic risk at residential receptors near heavily-trafficked freeway segments in the SCAG region. Table 3.3.4-3 in the 2016–2040 RTP/SCS Program EIR and Table 3.3-16 in the Connect 2020–2045 SoCal Program EIR disclose substantial reductions in 30-year residential carcinogenic risk at receptor locations near the region's most trafficked freeway segments. The 2016–2040 RTP/SCS Program EIR estimated that the carcinogenic risk from mobile sources along selected segments would decrease by an average of 92 percent over the corresponding planning horizon, and the Connect SoCal 2020–2045 RTP/SCS Program EIR estimated that the carcinogenic risk would decrease by an average of 66 percent over the corresponding planning horizon. Based on the MERV filter requirements and mandated improvements to vehicle technologies, future pollutant exposures would be significant reduced compared to existing conditions. The comment does not provide substantial evidence that additional analysis of future exposures to residents near the freeway is warranted beyond what is presented in the EIR. See also **Response 8-11** explaining why the Proposed Plan will not exacerbate diesel emissions on the freeway.

The comment about infrastructure is general and does not provide substantial evidence to support the claim that further infrastructure improvements are necessary to mitigate densification within the Hollywood Community Plan Area. Infrastructure impacts of the Proposed Plan are primarily analyzed in Section 4.16, Utilities and Service Systems, of the EIR. Also see **Master Response No. 4 – Infrastructure**. Please see **Response 1-5** for discussion of residential development in proximity to highways and potential health effects associated with noise. Additionally, please refer to Appendix N to the EIR for a robust discussion of the infeasibility of attempting to estimate neighborhood-wide health effects resulting from marginal increases in regional pollutant emissions.

Response 34-3

The comment states that the allowable proposed floor area ratio is a significant increase for properties along historic Route 66 but the Plan does not acknowledge significant impacts related to the change. The comment also expresses concern about TOC density and how infrastructure impact estimates have been calculated for such growth. The comment also states that the EIR does not properly analyze cumulative impacts because it does not identify related projects in bordering plan areas and cities.

Please refer to the Final EIR **Appendix C**, Updated Proposed Change Area Map and Change Matrix and **Appendix E**, Updated CPIO for more information regarding FAR in selected corridors of the Hollywood Community Plan Area. The EIR analyzes a Community Plan Area geography and a summary of the environmental impacts associated with the Proposed Plan is identified in Table 2-2, in Chapter 2.0, Summary, of the EIR. Each impact analysis section (4.1 through 4.16) discusses and acknowledges the environmental impacts of the Proposed Plan. TOC is accounted for in the total reasonably expected development as stated in Appendix B, Methodology and discussed in **Master Response No. 2 - Population, Housing, and Employment**. Infrastructure impacts of the Proposed Plan are analyzed in various sections of the EIR, including Section 4.14, Public Services and Section 4.16, Utilities and Service Systems. As applicable, worksheet calculations and other technical information are provided in the Appendices and reflect the upper range of the Proposed Plan's reasonably expected development numbers, which include TOC. As stated in Chapter 4.0 in the EIR on page 4.0-5, CEQA Guidelines Section 15130 allows for two approaches to study cumulative impacts: using a list of past, current and probable future projects or using a summary of projections (growth forecasts) from adopted local, regional or statewide plans. As the Proposed Plan is a

community plan update covering a larger area of the City over a 20 year planning period, the cumulative impacts analysis in the EIR uses the summary of projections method, utilizing the SCAG projections.

Response 34-4

The comment notes vacancy rates provided by the Los Angeles Area Chamber of Commerce as published in three annual Los Angeles City Council Districts Economic Reports in 2016, 2017, and 2018. The rates are for 2014, 2015, and 2016. The comment states that the vacancy rate is highest for Council District 13 at 9.2 percent followed by Council District 4 at 8.9 percent. The comment states that Hollywood is within the districts and has a declining population trend, and asks why the Plan is increasing development instead of having more restrictions on development.

Housing experts have published studies and discussed how the reduced construction of housing units after the year 2000 has contributed to the current housing crisis. Only about seven percent of the housing units in the Hollywood CPA have been built since 2000, according the recent 2019 American Community Survey 5-year data. The comment does not identify any new physical environmental impact but raises a policy question regarding planning for growth. The Proposed Plan has increases in development potential as well as decreases in development potential in selected areas of the Hollywood Community Plan Area. The total residential vacancy rate for the CPA is a different metric than the renter vacancy rate, which is much lower; residential vacancy is discussed in **Master Response No. 2 - Population, Housing, and Employment**.

Response 34-5

The comment refers to the comment letter sent by the La Mirada Avenue Neighborhood Association of Hollywood in 2011.

The 2011 letter is referring to ENV-2005-2158-EIR, which was released in March 2011 and later rescinded in 2014. The 2011 letter was bracketed 24-1 through 24-28. The new responses are provided below and are presented in the same order as the 2011 letter.

Hence, the following series of responses below refer to the referenced comment letter received in 2011. Please note that these responses include a reference to "2011 Comment Letter."

2011 Comment Letter - Response 24-1
The comment introduces the La Mirada Avenue Neighborhood Association of Hollywood.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

2011 Comment Letter - Response 24-2
The comment states that the Plan Update's proposed zoning increases is tied to SCAG's population and housing forecasts for 2030, however, the 2030 forecast overestimates population.

The EIR for the Proposed Plan was not prepared with SCAG's 2030 numbers, therefore, this comment is not relevant. The horizon year of the Proposed Plan is 2040.

2011 Comment Letter - Response 24-3
The comment states that previous SCAG forecasts for the City have overestimated population.

Forecasts are updated when new information and data become available and may change over time. The comment does not raise any new significant environmental issues or identify any new physical environmental impact. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. See **Master Response No. 2 – Population, Housing, and Employment**.

2011 Comment Letter - Response 24-4
The comment states that previous SCAG forecasts for Hollywood were higher but the 2030 forecast shows a lower number.

Forecasts are updated when new information and data become available and may change over time. The SCAG 2030 forecast was not referenced in the preparation of the EIR for the Proposed Plan, therefore, this comment is not relevant. The comment does not raise any new significant environmental issues or identify any new physical environmental impact.

2011 Comment Letter - Response 24-5
The comment states that a previous SCAG forecast stated a higher household number for the City of Los Angeles but the 2010 Census showed a smaller number.

Forecasts are updated when new information and data become available and may change over time. The comment does not raise any new significant environmental issues or identify any new physical environmental impact. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

2011 Comment Letter - Response 24-6
The comment states that 2010 Census data are available and the baseline needs to be 2010 data.

The EIR for the Proposed Plan uses a new baseline of 2016, the year the Notice of Preparation was published for the EIR, therefore, this comment is not relevant. The comment does not raise any new significant environmental issues or identify any new physical environmental impact.

2011 Comment Letter - Response 24-7
The comment states that two websites also show a decreased 2010 population for Hollywood.

The EIR for the Proposed Plan uses 2016 as the baseline year, not 2010, and this comment is not relevant. The comment does not raise any new significant environmental issues or identify any new physical environmental impact.

2011 Comment Letter - Response 24-8
The comment states there is a discrepancy between the SCAG population estimate and the 2010 Census population.

The EIR for the Proposed Plan uses 2016 as the baseline year, not 2010, and this comment is not relevant. The comment does not raise any new significant environmental issues or identify any new physical environmental impact.

2011 Comment Letter - Response 24-9
The comment states that the baseline is inaccurate, compared to the census data.

The EIR for the Proposed Plan uses 2016 as the baseline year, the year the Notice of Preparation was published for the EIR, therefore, this comment is not relevant. The comment does not raise any new significant environmental issues or identify any new physical environmental impacts.

2011 Comment Letter - Response 24-10
The comment states that the Plan Update can only plan for the population forecast by SCAG for the year 2030, and not exceed it.

The EIR for the Proposed Plan was not prepared with SCAG's 2030 numbers. The Proposed Plan uses SCAG's projections for the year 2040 because that is the horizon year of the Proposed Plan. Please also refer to **Master Response No. 2 – Population, Housing and Employment**.

2011 Comment Letter - Response 24-11
The comment states that the Plan Update is not following an "accomodationist approach" (for the year 2030) but would accommodate an additional amount.

The Proposed Plan is planning for the year 2040. Please also refer to **Master Response No. 2 – Population, Housing and Employment**.

2011 Comment Letter - Response 24-12
The comment states that using the 2010 Census population as the baseline instead of SCAG's makes the Plan update seem growth inducing, which makes the EIR conclusion on growth inducement inaccurate.

The EIR for the Proposed Plan uses a new baseline of 2016, the year the Notice of Preparation was published for the EIR. Referencing the 2010 Census data is not relevant; the EIR analyzes the difference between the 2016 baseline and the Proposed Plan's reasonably expected development figures in 2040. For clarification, the conclusion for Impact 4.13-1 in Section 4.13, Population, Housing, and Employment, on page 4.13-16 regarding whether the Proposed Plan would induce substantial population growth either directly or indirectly was less than significant. See the discussion on pages 4.13-16 and 4.13-7.

2011 Comment Letter - Response 24-13
The comment states that vacancy rates are increasing, and by planning for more density, the Plan Update is growth inducing.

Please see **Response 34-4** and **Response 24-12**.

2011 Comment Letter - Response 24-14
The comment states that the Plan Update would increase density in several areas near the freeway, and increase exposure of sensitive receptors to more pollution.

Limited areas where additional floor area ratio could be increased and are located near the freeway are generally selected based on factors such as land use designation/zoning, proximity to transit systems, and development potential. These areas are generally zoned commercial but residential uses are allowed. Whether density would increase on these properties depends on the proposed zoning of the specific site and the individual project proposed and built. For example, some areas along Santa Monica Boulevard near the freeway are proposed to have reduced density but increased building square footage (FAR). Some applicants may choose to develop non-residential projects.

Additionally, in 2018, the DCP issued Zoning Information File ZI No. 2427 Freeway Adjacent Advisory Notice for all properties citywide that are within 1,000 feet of freeways. Zoning Information No. 2427 states that air pollution studies indicate a strong link between the chronic exposure of populations to vehicle exhaust and particulate matter from roads and freeways and elevated risk of adverse impacts, particularly in sensitive populations such as young children and older adults The ZI advises applicants to consider project features and design alternatives such as avoid locating schools, day care facilities and senior care centers within the project, locate occupied open space areas as far as possible from the freeway, and prioritize the location of non-habitable uses, such as parking structures, nearest the freeway. In addition, all regularly occupied areas in mechanically ventilated buildings located within 1,000 feet of a freeway must install air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13 as part of the Clean Up Green Up Ordinance (Ordinance 184245). The ordinance requires that the filters be installed prior to occupancy. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Impact 4.3-4 concluded that the Proposed Plan could have a significant and unavoidable impact for construction and a less than significant impact on for operation regarding exposing sensitive receptors to substantial pollutant concentrations and includes mitigation measures to reduce toxic air contaminant

emissions generated by various construction activities. See pages 4.3-29 to 4.3-32 of the EIR for the discussion.

2011 Comment Letter - Response 24-15
The comment states that increasing density near the freeway can create impacts to human health.

Please refer to **Response 24-14**.

2011 Comment Letter - Response 24-16
The comment states that requiring filtration systems and precluding operable windows near freeways do not support the less than significant conclusion reached.

Section 4.3, Air Quality, of the EIR does not reference any discussion on windows, therefore, this comment from 2011 is not relevant. The City's Clean Up Green Up Ordinance (Ordinance No. 184245) mandates that regularly occupied areas in mechanically ventilated buildings within 1,000 feet of a freeway be provided with air filtration media for outside and return air that meet a MERV of 13, as stated on page 4.3-12 of the EIR. Impact 4.3-4 of the Proposed Plan's EIR concludes that the impact of exposing sensitive receptors to substantial pollutant concentrations to be significant and unavoidable during construction and less than significant for operation. Please see pages 4.3-29 to 4.3-32. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

2011 Comment Letter - Response 24-17
The comment states that inoperable windows are not an effective tool against air pollution.

Refer to **Response 24-16**.

2011 Comment Letter - Response 24-18
The comment states increasing density near freeways conflict with some of the Plan's land use goals and policies.

Refer to **Response 24-14**.

2011 Comment Letter - Response 24-19
The comment states that the proposed extension of the Regional Center land use designation is inconsistent with the General Plan Framework.

Chapter 1 of the General Plan Framework states that "As the City evolves over time, it is expected that areas not now recommended as neighborhood districts, community and regional centers, and mixed-use boulevards may be in the future appropriately so designated; and areas now so designated may not be appropriate. Therefore, the Framework Element long-range diagram may be amended to reflect the final determination made through the Community Plan Update process should those determinations be different from the adopted Framework Element." The Proposed Plan is concurrently amending the General Plan Framework Element maps, as stated in Chapter 3.0, Project Description, on page 3-18. Please also see the Staff Report and Exhibits for CPC-2016-1450-CPU. The existing Regional Center in central Hollywood was identified prior to the establishment and operation of Metro's Red Line stations. Under the Proposed Plan, the Regional Center in the Hollywood Community Plan Area is proposed to be expanded slightly, consistent with the concept of transit infrastructure concurrency. This Plan Update process has evaluated the provision of services within central Hollywood and has recommended the Regional Center be expanded slightly, consistent with the City's objectives to increase housing and job development potential in well-served transit areas.

2011 Comment Letter - Comment 24-20
The comment states that two proposed land use policies in the Regional Center of the Community Plan Area are inconsistent with the General Plan because they would promote growth beyond what is forecasted.

Specifically, the policies say "Utilize Floor Area Ratio bonuses to incentivize commercial and residential growth in the Regional Center" and "use planning tools to encourage jobs and housing growth in the Regional Center."

The two specific policies referenced from the 2011 comment are not contained in the new Hollywood Community Plan, which is found in the Final EIR Updated **Appendix D**. A policy is a clear statement that guides a specific course of action for decision makers to achieve a desired goal. Policies are not mandates or regulations. The new Community Plan has policies that would promote commercial and residential development in the Regional Center, which is adjacent to transit infrastructure, and has an existing variety of uses, including ones for tourism destination, shopping and cultural uses. The Framework Element describes a regional center as a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, residential buildings, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Regional Centers cater to many neighborhoods and communities and serve a much larger population than either Community Centers or Neighborhood Districts. They are generally high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. They typically provide a significant number of jobs, but are also non-work destinations as well. As a result of their densities and functions, Regional Centers are usually located near major transportation hubs or along major transportation corridors. Hollywood's Regional Center – a highly urbanized area with commercial, residential, and visitor-serving uses adjacent to transit systems – is consistent with the General Framework definition of a Regional Center, where jobs and housing are envisioned.

2011 Comment Letter - Response 24-21
The comment states that the inconsistency of the proposed policies mentioned is a CEQA land use impact and also makes the City unable to meet the required General Plan consistency findings.

The EIR for the Proposed Plan concludes a less than significant impact for Impact 4.10-2 as discussed on pages 4.10-17 to 4.10-25. This impact asks if implementation of the Proposed Plan would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. As discussed in the EIR and 2011 Comment Letter – Response 24-19 and 24-20, the Proposed Plan is consistent with all applicable plans and the City has not identified inconsistencies with applicable general plans, specific plans and regional plans.

2011 Comment Letter - Response 24-22
The comment provides citations of CEQA Guidelines on cumulative impacts.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

2011 Comment Letter - Response 24-23
The comment states that the cumulative impact analysis does not provide a list or identify related projects, and cumulative impacts must be analyzed.

As stated in Chapter 4.0 in the EIR on page 4.0-5, CEQA Guidelines Section 15130 allows for two approaches to study cumulative impacts: using a list of past, current and probable future projects or using a summary of projections (growth forecasts) from adopted local, regional or statewide plans. As the Proposed Plan is a community plan update covering a larger area of the City over a 20 plus year planning period, the cumulative impacts analysis in the EIR uses the summary of projections method, utilizing the SCAG projections. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

2011 Comment Letter - Response 24-24
The comment provides legal citations regarding cumulative impacts.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

2011 Comment Letter - Response 24-25
The comment states that there is an attached correspondence from a consulting traffic engineer.

The attached correspondence is not provided as part of the 2019 comment letter, and therefore, no response is provided.

2011 Comment Letter - Response 24-26
The comment states that the existing Community Plan can accommodate the growth forecast by SCAG through the year 2030.

The Proposed Plan is planning for the year 2040. The Proposed Plan's EIR has a No Project Alternative (Alternative 1: Continuation of Existing Plan), which is discussed in Chapter 5.0, Alternatives. Chapter 5.0 describes a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or substantially lessen significant environmental impacts while attaining most of the basic objectives of the project. Section 5.4 Alternatives Considered and Eliminated From Further Evaluation contain alternatives that were dismissed because they do not attain most of the basic objectives of the project. Please also refer to **Master Response No. 2 – Population, Housing and Employment**.

2011 Comment Letter - Response 24-27
The comment states that the EIR does not provide a reasonable range of alternatives, and must include a loss of population as an alternative.

The comment refers to the alternatives prepared for a previous EIR in 2011. The EIR prepared for the Proposed Plan provides five alternatives, which are discussed in Chapter 5.0, Alternatives. Chapter 5.0 describes a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or substantially lessen significant environmental impacts while attaining most of the basic objectives of the project. Section 5.4, Alternatives Considered and Eliminated From Further Evaluation, contain alternatives that were dismissed because they do not attain most of the basic objectives of the project.

2011 Comment Letter - Response 24-28
The comment provides conclusion remarks that the Plan Update EIR has issues as described in Comment Letter No. 24 and the EIR needs to be recirculated.

The comment letter refers to a previous EIR released in 2011 that has been rescinded, therefore, this comment is not relevant.

LETTER NO. 35

Jamie T. Hall, President
Laurel Canyon Land Trust

Responses 35-1 and 35-2

The comment introduces the Laurel Canyon Land Trust (LCLT), and its mission to protect and preserve open space, including acquisition of undeveloped lands in Laurel Canyon and conservation easements. The

comment states that LCLT supports the open space preservation policy (PR3.1) and suggests implementation programs, such as the preservation of habitat linkages in the Santa Monica Mountains.

The comments will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan; see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 36
Jamie T. Hall, President
Laurel Canyon Association

Response 36-1

The comment introduces Laurel Canyon Association (LCA), the Doheny-Sunset Plaza Neighborhood Association (DSPNA), the Los Feliz Improvement Association (LFIA), and the Nichols Canyon Neighborhood Association (NCNA). The comment states general concerns about hillside development in the Hollywood Hills and how hillside issues are addressed in the Plan and EIR. The comment states that the comments in the letter focus on the EIR but also include the Community Plan.

This introductory comment is a general comment. **Responses 36-2** to **36-82** below address the specific comments on the Proposed Project and the environmental analysis in the EIR.

Response 36-2

This comment cites text from the Hollywood Community Plan's introduction on page 1-1, and the City's Framework Element Guiding Principles and Mobility Plan 2035's goals as provided in the Community Plan. The comment expresses concern that the Community Plan overall does not focus enough on the hillside areas. The comment states there are some important policies and implementation programs included for preserving hillside neighborhood character but more implementation programs can be added and implementation programs should be firm requirements.

The Community Plan has a variety of implementation programs concerning the hillside communities associated with policies stated in Chapter 3 of the Community Plan. As stated in Chapter 1: Introduction of the Community Plan, an implementation program is an action, procedure, program or technique that carries out goals and policies. Implementation programs are comprehensive in nature, encompassing amendments of existing and preparation of new plans, ordinances, and development and design standards; modification of City procedures and development review and approval processes; and interagency coordination. Completion of a recommended implementation program will depend on a number of factors such as City priorities, finances, and staff availability. These recommendations are suggestions to future City decision-makers as ways to implement the goals and policies contained in the Community Plan. For clarification, as stated in Chapter 7: Implementation in the Draft Community Plan (see Final EIR Updated **Appendix D**, Draft Community Plan): "While the Community Plan policies and implementation programs are limited to authorities that can be implemented under the jurisdiction of the City of Los Angeles, implementation of some Plan policies may also require coordination and joint actions with numerous local, regional, state, and federal agencies. These agencies provide services, facilities, or funding and administer regulations that directly or indirectly affect many issues addressed in the Community Plan." Furthermore, this chapter also explains that sources of funding are contingent of the availability of adequate funding, see page 7-3.

Please also refer to **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 36-3

The comment states that existing protections are inadequate to protect against mansionization, excessive grading, and incompatible infill development. The comment states that suggestions on land use policies and implementation programs are provided, but states they are based on environmental impact concerns and should be treated as suggested mitigation measures for the EIR.

The comment also requests additional implementation programs specific to hillside communities under neighborhood character Policy LU1.1: the development of a lot merger ordinance aimed at eliminating substandard lots, zoning updates to private street developments, limiting short-term rentals, and the development of additional Specific Plans and zoning protections in the hillside neighborhoods

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. As noted in Chapter 2.0, Summary, of the EIR, the EIR assesses the potential significant environmental impact, including significant unavoidable impacts and cumulative impacts, related to the Proposed Plan. Where there is potential for a significant adverse effect, the EIR identifies mitigation measures that would either eliminate the impact or reduce the effect to a less-than-significant level, where possible. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would substantially degrade the existing visual character or quality of the site and its surroundings; see pages 4.1-32 to 4.1-40 of the EIR for the discussion. No mitigation measures are required. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would result in substantial soil erosion or the loss of topsoil; see pages 4.16-19 to 4.16-20 for the discussion. No mitigation measures are required.

The Community Plan has added implementation programs that address zoning protections in hillside neighborhoods based on physical features such as lot size and slope. See Chapter 7, Table 7-2 in the Final EIR Updated **Appendix D**, Draft Community Plan.

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-4

The comment requests an implementation program for Policy LU1.4, which limits hillside density on steep slopes in the Community Plan, that would further limit density and development on sites with extreme slopes and allow more public comment on such projects.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would result in substantial soil erosion or the loss of topsoil; see pages 4.16-19 to 4.16-20 for the discussion. No mitigation measures are required.

For clarification, Policy LU1.4, limits density on lots with average natural slopes in excess of 15 percent under the single family land use designation to the Minimum Residential land use density, which is the lowest density permitted in the Hollywood Community Plan Area. The Minimum Residential land use density allows one dwelling unit per 40,000 square feet of lot area, which is nearly one acre. Currently, the existing 1988 Hollywood Community Plan states that "it is the intent of this Plan that all natural slopes generally in excess of 15 percent be limited to the minimum density range." The Hollywood Community Plan Update clarifies this existing language under both Policy LU1.5 and General Plan Land Use Map Footnote 1: Notwithstanding any land use designation to the contrary, all projects on properties designated under a Single Family land use designation (Minimum, Very Low II, Low I, or Low II) with average natural slopes in excess of 15 percent shall be limited to the Minimum Residential General Plan land use designation (i.e. Minimum Density housing category of one dwelling unit per 40,000 square feet of lot area) for the purpose of enforcing the slope density formula in 17.05C (Tentative Tract Maps), and 17.50E (Parcel Maps). A General Plan Amendment, a discretionary entitlement, would need to be requested and approved should an applicant seek to increase the restricted density of such properties. This hillside slope density limit is regulatory under the Proposed Plan, therefore no implementation program is required. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-5

The comment requests additional implementation programs for Policies LU1.5 (slope density) and LU1.7 (front yard character) in the Community Plan.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR.

For clarification, Policy LU1.5 requires that entitlements requesting a lot line adjustment, on lots subject to the slope density ordinance, be conditioned to document existing average natural slopes for the entire parcel and maintain overall density restrictions pursuant to the intent of the slope density formula of Section 17.05." Policy LU1.7 discourages parking in between the street and front of the structure. Per LAMC Section 12.21.C.1.(g): No automobile parking space shall be provided or maintained within a required front yard. Except where a lot is developed with a building meeting the requirements of Section 12.08.3B1, not more than 50 percent of a required front yard shall be designed, improved or used for access driveways." Therefore, parking in the front yard is not permitted in the LAMC. For inquiries on zoning compliance, please contact LADBS. LADBS includes a Code Enforcement unit, which can be reached at (213) 473-3231; the website is ladbs.org/services/core-services/code-enforcement. A new implementation program has been added in the Community Plan under Policy LU1.7 – Program 82.

The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-6

The comment is regarding Policy LU2.1 (Preserve neighborhood scale), and requests making Implementation Programs P3 (study hillside neighborhoods to protect from out-of-scale development), P4 (consider the development of a ridgeline protection ordinance), P5 (consider hillside design standards), and P6 (evaluate retaining wall requirements) into requirements. The comment also requests that the NCNA, DSPNA, LFIA, and other Hollywood Hills neighborhoods be added to Program 3 and to develop a Hollywood Hills Protection Ordinance under Program 4. The comment also requests two new implementation programs, one that evaluates when and why Zoning Administrator Determinations (ZAD) have approved deviations from the code and one that makes such deviations more difficult to obtain. The comment also requests implementation programs for neighborhood height transitions (Policy LU2.2).

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. As noted in the Chapter 2.0, Summary, of the EIR, the EIR assesses the potential significant environmental impact, including significant unavoidable impacts and cumulative impacts, related to the Proposed Plan. Where there is potential for a significant adverse effect, the EIR identifies mitigation measures that would either eliminate the impact or reduce the effect to a less-than-significant level, where possible. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would substantially degrade the existing visual character or quality of the site and its surroundings; see pages 4.1-32 to 4.1-40 of the EIR for the discussion. No mitigation measures are required. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would result in substantial soil erosion or the loss of topsoil; see pages 4.16-19 to 4.16-20 for the discussion. No mitigation measures are required.

The Community Plan has updated the text under Program 3 to identify the Nichols Canyon, Doheny Sunset Plaza, Los Feliz, and other Hollywood Hills neighborhoods and has added Program 146 as a new implementation program under Policy LU2.1.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-7

The comment requests additional implementation programs for Policy LU2.3 regarding public views in the Community Plan, and that they should apply to both discretionary and ministerial projects. The comment also requests additional design guidelines or protections for ministerial projects.

For clarification, Policy LU2.3 requires discretionary projects to condition impacts to public viewsheds. Conditions of approval cannot be applied to ministerial projects.

The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would have a substantial adverse effect on a scenic vista; see pages 4.1-28 to 4.1-31 for the discussion. No mitigation measures are required. Refer to **Response 36-6**.

The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-8

The comment requests additional implementation programs for Policy LU2.4 (Hillside Secondary Access) in the Community Plan, including a program to rezone paper streets as open space due to their location on extremely steep slopes, a program to require private street developments to be subject to Zoning Administrator Determination, and a program to reincorporate streets withdrawn from public use.

The explanation below regarding paper streets, private street development, and reincorporating streets withdrawn from public use is provided for clarification.

Policy LU2.4 encourages exploration of connecting secondary access networks for emergency access and public safety when considering an application for hillside subdivisions, as well as extensions, completions, and connections of existing street networks. Hillside subdivisions are subject to the review procedures outlined in LAMC Section 17.00.

A paper street is a street that has been impassable for vehicular travel for a period of five consecutive years and for which no public money was expended for maintenance during that period (Ref. Sec. 8331 California Code, Streets and Highways Code). A new policy (Policy PR3.4) has been added to address future rezoning of paper streets for open space easements, along with implementation program P136 to identify and map paper streets in the hillsides. The request to create an implementation program to reclassify vacant streets as open space is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

The development of a private street is reviewed by the Director of Planning in accordance with LAMC Section 18.00. An amendment to LAMC Section 18.00 is a full work program that requires authorization and initiation from the City Council as to provide funding for a plan update that would generally require city planning staffing and CEQA review, a public participation process, and coordination.

The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would result in substantial soil erosion or the loss of topsoil; see pages 4.16-19 to 4.16-20 for the discussion. No mitigation measures are required. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-9

The comment generally requests an implementation program be created for Policy LU2.5 (Hillside Neighborhood Character) in the Community Plan and requests the policy name additional Hollywood Hills neighborhoods.

For clarification, Policy LU2.5 requires that entitlement applications consider the existing built character of distinctive hillside neighborhoods, including Laurel Canyon, Outpost Estates, and Hollywood Knolls, when reviewing discretionary development proposals. The Community Plan has updated the text under Program 3 to identify Nichols Canyon, Doheny Canyon Sunset Plaza, and Los Feliz neighborhoods for future consideration of new zoning regulations to address building scale.

The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would substantially degrade the existing visual character or quality of the site and its surroundings; see pages 4.1-32 to 4.1-40 of the EIR for the discussion. No mitigation measures are required. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-10

The comment states that Implementation Program P19 (study and update evacuation routes for hillside areas) should include requirements to address emergency access and limit truck traffic and size. The comment also requests that the Proposed Plan include increased outreach for brush-clearance and year-round inspection programs in the Hollywood Hills.

The EIR concludes that the Proposed Plan would not result in a significant impact to emergency access; see pages 4.15-45 to 4.15-60 of the Recirculated EIR for the discussion. No mitigation measures are required. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR.

The Los Angeles Fire Department conducts brush clearance outreach and implements regulations; the Fire Department also has enforcement authority. New brush clearance requirements were increased for fire safety in the Very High Fire Hazard Severity Zones, adopted in October 2018 in Ordinance 185789 (see Council File 09-1977-S2). Or, go online to visit https://www.lafd.org/fire-prevention/brush/brush-clearance-requirements. The Brush Clearance Unit can be reached by phone at (800) 994-4444 and its website is www.lafd.org/brush. Due to existing and recently enhanced brush clearance regulations, the request to address brush clearance as a mitigation measure is not necessary.

Please also see **Master Response No. 5 – Emergency Services**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-11

The comment states that the policies in the Community Plan related to open space preservation are not fully realized by associated implementation programs and suggests programs for habitat linkages, rezoning paper streets, grant funding for vacant land acquisition, and Griffith Park access.

See **Response 36-8** for information about paper streets. The comment provides suggestions for implementation programs in the Proposed Plan and does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. Please see Chapter 3: Land Use & Urban Form of the Community Plan and also Chapter 7: Implementation for more information. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-12

The comment requests an additional implementation program for Policy PR4.5 (Open Space designations) in the Community Plan and requests that this program include a mechanism for rezoning and re-designating the Land Use of the property for the purpose of open space preservation.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The Proposed Plan is re-designating more than 300 acres of land to the Open Space land use designation for the purpose of open space preservation. The General Plan Land Use Map footnote (Administrative Note No. 3) supports the redesignation of vacant land for the purpose of conservation to Open Space as appropriate: The Open Space (OS) land use designation is premised on the ownership and use of the property by a government agency, nonprofit or conservation land trust for the primary purposes of public recreation use or open space conservation. The designation of the Open Space (OS) zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency, nonprofit or conservation land trust officially determines that vacant land under their ownership is to be used as open space, the property may be redesignated and/or rezoned to Open Space. Please see the Staff Recommendation Report for CPC-2016-1450-CPU for more information and refer to **Master Response No. 1 - General Comments and Non-CEQA Issues.** The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-13

The comment requests additional implementation programs for Policies M7.1 (Identification and Preservation of Scenic Highways) and M7.3 (Trail Connections) in the Community Plan. Specifically, the comment requests a program to evaluate and designate appropriate hillside roadways as scenic highways and to have programs that address M7.3.

Policy M7.1 states that the Plan is supportive of the identification and preservation of Scenic Highways. Policy M7.3 encourages a network of trail connections to facilitate recreational uses, such as mountain biking, horseback riding and hiking.

The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The EIR concludes no impact on whether the implementation of the Proposed Plan would substantially damage scenic resources within a state scenic highway. There are no state scenic highways in the Project Area, as stated on page 4.1-31 of the EIR. There are seven City-designated scenic highways within or along the boundaries of the Project Area, as listed in Table 4.1-2 on page 4.1-23 of the EIR. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would substantially degrade the existing visual character or quality of the site and its surroundings on the seven City-designated scenic highways on page 4.1-39. No mitigation measures are required.

The Community Plan has added Program 142, which includes the study of additional highways for scenic highway designation; and Program 143, which addresses identification of future trails; see the Final EIR Updated **Appendix D**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-14

The comment states that Implementation Programs P35 and P36 for historic preservation should be expanded to address hillside area neighborhood preservation. The comment also states that the Community Plan needs to address habitat preservation within the Santa Monica Mountains portion of the CPA, and the policies and programs need to ensure that development is consistent with the Santa Monica Mountains Conservancy Act.

The Community Plan includes Implementation Programs P2 and P3 which support Land Use Policy LU2.1 – Preserve Neighborhood Scale in the hillside areas of the CPA. The requested implementation program does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**. Regarding the commenters request for inclusion of more detailed discussion of the SMMC, please see **Master Response No. 7 – Biological Resources**.

Response 36-15

The comment states that additional policies are needed to address hillside traffic issues related to cut through traffic, existing poor roadway conditions, demand for on-street parking, emergency vehicle and residential access and hillside construction and associated over-sized vehicles. The comment makes suggestions regarding several implementation programs contained in the Community Plan.

The requested implementation program revisions do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The Proposed Plan is establishing a new Hillside Construction Regulation (HCR) district covering additional hillside communities in Hollywood; please refer to the CPC-2016-1450-CPU Staff Report and Exhibits. Additional policies and programs have been added to the Community Plan, such as P146: "Consider amendments to the existing HCR to address enforcement; coordinate hauling and grading activities; and clarify public and private street improvements standards. Expand application of HCR as appropriate." Please also see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 4 – Infrastructure**.

Response 36-16

The comment requests additional implementation programs for Policies M7.1 (Identification and Preservation of Scenic Highways) and M7.2 (Public Views) in the Community Plan, specifically stating the preparation of a Laurel Canyon Scenic Highway Plan.

Policy M7.1 states that the Plan is supportive of the identification and preservation of Scenic Highways; please refer to **Response 36-13**. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would have a substantial adverse effect on a scenic vista; see pages 4.1-28 to 4.1-31 for the discussion. No mitigation measures are required.

Policy M7.2 states that development adjacent to a Scenic Highway should integrate public view protection of scenic vistas to the maximum extent feasible; be adequately landscaped to soften the visual impact of development; and where appropriate, provide access, hiking or biking trails, a turn out, vista point or other complementary facility. The EIR concludes that implementation of the Proposed Plan would have not have an impact on a scenic highway; see pages 4.1-31 to 4.1-32 for the discussion. No mitigation measures are required.

As noted in **Response 36-13**, a new implementation program (Program 142) has been added to the Community Plan, and the program includes the study of additional highways for scenic highway designation. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-17

The comment states that the Proposed Plan's reasonably expected development considerably exceeds the 2040 forecast prepared by the SCAG, and the growth expected under the existing Hollywood Community Plan. The comment states the Plan does not explain why this level of development is desirable, and why the excess will not result in significant and unavoidable impacts greater than those that would occur at SCAG development levels. The comment also states that the Plan does not address infrastructure issues, and hillside communities have ongoing infrastructure problems that need to be acknowledged. The comment states that in the absence of an Infrastructure Element update, it appears the Plan would create

inconsistencies between the General Plan elements and between zoning and the Infrastructure Element of the General Plan.

Please refer to **Master Response No. 2 – Population, Housing, and Employment**.

Infrastructure is a broad topic that is addressed in different sections of the EIR, but primarily in Section 4.16, Utilities and Service Systems, and Section 4.14, Public Services. Also, refer to **Master Response No. 4 – Infrastructure**. The comment does not identify any new physical environmental impacts regarding infrastructure. The vague comment does not provide substantial evidence regarding potential inconsistencies between the Proposed Plan, the General Plan and zoning but offers speculation or opinion. The overarching purpose of addressing infrastructure in the citywide Framework Element and the General Plan is to provide for expected growth and maintain or improve existing service systems or facilities, which would be an ongoing objective. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 36-18

The comment provides a summary of the impacts disclosed in the EIR, the Alternatives provided in Chapter 5.0, Alternatives of the EIR and selected text from Chapter 3.0, Project Description of the EIR. The comment states that the EIR inappropriately rejected all alternatives discussed in Chapter 5.0 and that the reference to resolutions, zoning ordinances, Specific Plan amendments, and amendments to the Framework and Mobility Elements of the General Plan contained in Chapter 3.0, Project Description should be an appendix to the EIR.

The EIR does not inappropriately reject the alternatives provided in Chapter 5.0 Alternatives, based on the comparative evaluation of the project objectives (see Table 5-1 in Chapter 5.0, Alternatives). In contrast to the Proposed Plan, none of the alternatives would meet the primary or secondary project objectives or the underlying purpose of the Proposed Plan, including because they would not meet the growth strategies of the Framework Element the policies of SB 375, and the RTP/SCS to increase density around transit and regional centers. Furthermore, each of the alternatives discussed in Chapter 5.0 of the EIR would result in significant and unavoidable impacts, including the No Project Alternative, which would be a continuation of the existing 1988 HCP. Chapter 5.0 of the EIR discloses that the Environmentally Superior Alternative would be the Reduced Alternative (Alternative 2) as discussed on page 5-37. However, although Alternative 2 was found to reduce impacts on air quality, greenhouse gas emissions, noise and traffic when compared to the Proposed Plan, these impacts would remain significant and unavoidable regardless of the reduction in severity. Furthermore, the commenter provides no substantial evidence that the alternatives described in Chapter 5.0, Alternatives were inappropriately rejected or demonstrate that any of the alternatives would reduce environmental impacts while also meeting the primary and secondary objectives of the Proposed Plan. No further response is required (CEQA Guidelines Section 15204(c)).

Regarding the request to include anticipated resolutions, zoning ordinances, Specific Plan amendments, and amendments to the Framework and Mobility Elements of the General Plan in the EIR, such planning documents are prepared during the adoption process separate from the preparation of the EIR. What was known of the policy proposals that would be part of the Proposed Project at the time the Draft EIR was prepared and released was disclosed in Chapter 3-Project Description. The Change Area Map and Change Matrix (Final EIR Updated **Appendix C**) and the Proposed CPIO (Final EIR Updated **Appendix D**) serve as the basis for future planning documents (resolutions and zoning ordinances) that become publicly available when the Proposed Plan is considered and reviewed by the City Planning Commission, the Planning and Land Use Committee of the City Council, and the full City Council.

Response 36-19

The comment states that the EIR needs to clarify the assumptions related to TOC and ADU development used to develop the numerical ranges analyzed stating that the information in Appendix B, Methodology is

insufficient. The comment also states that the EIR needs to clarify how Non-Change Areas could be developed to more intense uses or density as allowed by the Proposed Plan.

Please see **Master Response No. 2 – Population, Housing, and Employment** for a discussion of the City's assumptions related to TOC and ADU in forecasting reasonably anticipated development. Regarding Non-Change Areas, on page 3-19 of the EIR states that the Non-Change Areas may still redevelop to more intense uses or density *as allowed* (emphasis added) by current and Proposed Plan regulations. The text in the EIR is stating that although no land use changes are proposed in the Non-Change Areas, properties within these areas can still intensify development beyond existing conditions but not beyond what is allowed by existing zoning and Proposed Plan regulations.

Response 36-20

The comment summarizes the level of significance for the impact discussion of scenic vistas, scenic resources within a State Scenic Highway, visual character, lighting, and glare. The comment states that the discussion of PRC Section 21099(d) on page 4.1-1 is misleading and should be augmented because areas that are both Transit Priority Areas and covered by Specific Plans, CDOs, HPOZs, or [Q] or [D] designations which include design guidelines or other components aimed at addressing aesthetic concerns are still subjected to the need for aesthetic resource impacts analysis under CEQA and City guidance. The comment also states that the EIR needs to address the aesthetic and other impacts of development consistent with the TOC Guidelines on Los Feliz and other neighborhoods in the CPA. The commenter expressed the concern that the TOC Guidelines would be used to override all other development ordinances and design protections with little ability for the City's decision makers to provide oversight. The comment states that the EIR needs to provide mitigation in the form of additional zoning protections and Hollywood-specific TOC Guidelines developed in consultation with affected neighborhood associations, amid protecting Hollywood neighborhoods from out-of-scale and poorly designed development.

Please see page 4.1-27 of the Draft EIR which states that: "this EIR will consider aesthetic impacts from the implementation of the Proposed Plan in all areas of the plan, including TPAs and including development that would qualify for SB 743 exemption for aesthetics." Please also see **Chapter 4.0, Corrections and Additions** for page 4.1-1 and the discussion of SB 743 (PRC Section 21099). Development permitted under the TOC Guidelines were taken into account in the analysis for impacts to visual character under Impact 4.1-3. For a discussion of TOC and aesthetics, refer to **Response 27-3**. Please see Final EIR Updated **Appendix C**, Change Area Map and Change Matrix, Updated **Appendix D**, Proposed CPIO and the Staff Report for CPC-2016-1450-CPU for additional information.

As noted in **Chapter 2.0, Modifications and Technical Refinements to the Proposed Plan and Environmental Effects**, the Hollywood CPIO District includes an affordable housing program that would replace the TOC program for properties within the CPIO District subareas. The affordable housing incentives are tailored to the specific CPIO subareas and include increased density, floor area, and height for projects that include the required percentage of onsite affordable housing. As noted above, the EIR considered potential heights of structures permitted under the TOC program, which is within the parameters of the affordable housing incentives in the Hollywood CPIO. The CPIO District also includes development standards to address pedestrian-oriented design and compatibility with the context of the existing surrounding neighborhood.

Based on all of the above, the EIR analyzed aesthetic impacts from development in transit priority areas, including those in TOC or in CPIO District subareas. Commenter provides no substantial evidence the Proposed Plan will result in a significant environmental impact related to aesthetics.

Response 36-21

The comment states that the discussion in the second paragraph on page 4.1-29 in the EIR regarding new structures in the hillside residential areas is not adequately supported and the commenter would like an

explanation of how the Plan's subdivision controls are stricter and would limit density for hillside properties that are on natural slopes that exceed 15 percent. The commenter requests several clarifications: the explanation on page 4.1-33 to be expanded; examples of allowable development under existing conditions and under the HCP for hillside properties with slopes greater than 15 percent; if there are additional controls to limit the size of single-family homes in hillside areas; the EIR to characterize the rate at which construction, additions, and redevelopment is occurring in the Hollywood Hills; the EIR to demonstrate that the Proposed Plan would ensure that new structures would be consistent in size and scale with existing hillside neighborhoods or include mitigation measures to ensure that the existing size and scale are maintained; the EIR to demonstrate that development under the Proposed Plan would not significantly alter hillsides as compared to existing conditions; and the EIR to address views from within the Santa Monica Mountains and along roadways in the Santa Monica Mountains, not just views from the flatlands.

The City currently regulates hillside development through a variety of mechanisms including the Baseline Hillside Mansionization (BMO) Ordinance and the R1 single-family citywide regulations in effect since March 17, 2017, and as applicable, Specific Plans, and Site Plan Review. The R1 single-family regulations in designated Hillside Areas reduce the residential FAR from 0.5:1 to 0.45:1 for the lowest slope band (0 to 14.99 percent); see Table 12.21 C.10-2a of the LAMC. In addition, the guaranteed minimum residential floor area is reduced from 1,000 square feet to 800 square feet; see Table 12.21 C.10-3 of the LAMC. Grading quantities and hours of operation for earth import and export activities were also further restricted; see Table 12.21 C.10-6 of the LAMC, and import/export activity hours were also further restricted to only take place between 9:00 a.m. and 3:00 p.m. Monday through Friday, 12.21 C.10.(f)(2). Some hillside communities are also within Hillside Construction Regulation (HCR) districts, which addresses construction-related restrictions and includes a Site Plan Review threshold for large, single-family projects. The Site Plan Review discretionary approval is required when single-family projects in HCR districts are 17,500 square feet or larger; this square footage is approximately 0.4:1 FAR on a one-acre lot. Site Plan Review findings include declarations of compatibility, including height and bulk, with existing and future development on adjacent and neighboring properties. The Proposed Plan is adding additional Hollywood hillside communities on both sides of the US-101 Freeway to a new HCR district. City Planning is preparing a Ridgeline Protection Ordinance in response to a City Council Motion, CF 11-1441-S1, that would better preserve and protect the City's ridgelines with objectives to address the intensity and scale of development. This is a separate work program to create a Ridgeline Protection Supplemental Use District (SUD) and implement the regulations in a pilot study area. A portion of the Hollywood Community Plan Area is within the pilot study area where the Ridgeline Protection ordinance will first go into effect; a public hearing was held in June 2021 regarding the establishment of the Ridgeline Protection Supplemental Use District and the zone changes that will effectuate the application of the ridgeline protection regulations for the pilot study area. The pilot study covers much of the Bel Air-Beverly Crest area within the CPA, west of Laurel Canyon Boulevard.

The Proposed Plan includes development regulations and guidelines that protect hillside neighborhoods.

- Policy LU1.4 limits density in hillside areas with average natural slopes in excess of 15 percent under the single family land use designation to the Minimum Residential land use designation and density.

Policy LU1.4 is mandatory, and is reinforced by regulatory General Plan Land Use Map Footnote No. 1: Notwithstanding any land use designation to the contrary, all projects on properties designated under a Single Family land use designation (Minimum, Very Low II, Low I, or Low II) with average natural slopes in excess of 15 percent shall be limited to the Minimum Residential General Plan land use designation (i.e., Minimum Density housing category of one dwelling unit per 40,000 square feet of lot area) for the purpose of enforcing the slope density formula in 17.05C (Tentative Tract Maps), and 17.50E (Parcel Maps). A General Plan Amendment, a discretionary entitlement, would need to be requested and approved should an applicant seek to increase the restricted density of such properties. The type of development that will occur in the hillsides is consistent with existing development in the hillsides and existing applicable zoning and would not foreseeably result in aesthetic impacts. A range of single-family housing sizes already exist in the

hillside neighborhoods of Hollywood in large part based on lot size as hillside lots can be less than 5,000 square feet or more than one acre in size, although new development projects are subject to stricter regulations that address scale and/or design. A minimum lot size of 5,000 square feet is required to develop a single-family house under R1 zoning, however, there are some nonconforming lot sizes that have existing houses that were built decades ago. In addition to the citywide BMO and R1 zoning ordinances, there are other scale and/or design regulations that apply to specific hillside neighborhoods, such as the Mulholland Scenic Parkway Specific Plan, the Hollywoodland Specific Plan, and the Oaks of Los Feliz (Ordinance Nos. 181136 and 184725). All these regulations will continue to apply under the Proposed Plan. In addition, the Proposed Plan will not encourage, incentivize or result in development in the hillside areas.

The following policies contained within the Community Plan would limit density and scale in the hillsides:

- Policy LU1.5 conditions the approval of lot line adjustments, where either lot is subject to the Slope Density Ordinance prior to the lot adjustment, to document existing average natural slopes for the entire parcel and maintain overall density restrictions.
- Policy LU2.1 would preserve stable single-family zoned residential neighborhoods in the hillsides and flatlands by preventing out-of-scale development and to ensure that new single-family construction is compatible with the scale and character of existing residential neighborhoods.
- Policy LU2.5 would consider the existing built character of distinctive hillside neighborhoods when reviewing discretionary development proposals.

In addition to the above policies, the following implementation programs are listed in Table 7-2 of the Proposed Plan:

- P2 – Maintain and enforce the City's Baseline Hillside Mansionization Ordinance, The Oaks' hillside zoning restrictions, and the Mulholland and Hollywoodland Specific Plans.
- P3 – Study hillside neighborhoods, including the Laurel Canyon, Nichols Canyon, Doheny Plaza and Los Feliz neighborhoods, to protect single-family neighborhoods in the hillsides from out-of-scale "mansionized" development.
- P4 – Consider the development of a Ridgeline Protection Ordinance to preserve the contours of natural ridgelines and continue to study hillside regulation.
- P5 – Consider design standards to protect hillside neighborhoods from over-sized development. Further study R1 variation zones in the hillsides based on physical features such as lot size and slope.
- P7 – Coordinate with City Departments to further study ridgeline mapping in Hollywood to further inform hillside protection areas and improve regulations.
- P146 – Consider amendments to the existing Hillside Construction Regulations (HCR) to address enforcement; coordinate hauling and grading activities; and clarify public and private street improvements standards. Expand application of HCR as appropriate.

The few Change Areas proposed in the hillsides are to generally correct for existing uses, such as open space in Griffith Park, or to maintain existing neighborhood scale. Hillside parcels will be subject to applicable existing City regulations (including the Baseline Hillside Mansionization Ordinance) and would be guided by policies and programs of the Proposed Plan. The rate of construction, additions, and redevelopment in the Hollywood Hills is not anticipated to be affected by the Proposed Plan since the Proposed Plan does not include changes to increase development potential in the hillsides. No Active Change Areas are in the hillsides. See **Master Response No. 9 – Hillsides**. There is no change to zoning, land use or development standards to allow housing in the hillsides and the only policy changes are to protect the hillsides. Therefore, the Proposed Plan will not induce, encourage or result in development in the hillsides and will not result in aesthetic impacts.

Policy LU2.3 of the Community Plan states that the protection of public views that are visible from public roadways and parklands be a consideration when reviewing discretionary development proposals in the hills and foothills. The EIR addresses the views from within the Santa Monica Mountains and from the flatlands. With regards to views from the Santa Monica Mountains, the EIR discusses how the Proposed Plan would affect views from the Jerome C. Daniel Overlook and the Universal City Overlook, both of which are located within the Santa Monica Mountains. These views represent the scenic views available from various publicly accessible locations in the Hollywood Hills, Santa Monica Mountains, and other hilly areas within the CPA, including public roadways in the Santa Monica Mountains. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 36-22

The comment requests that the specific objectives, policies, and programs that are included in the Conservation Element that ensure the protection of natural terrain and landforms, unique site features, scenic highways, and panoramic public views in the Hollywood Hills be identified. The comment also requests an explanation as to how the objectives, policies, and programs are furthered by the Proposed Plan. The comment also requests an explanation as to how the Proposed Plan complies with Policy 5.1.1, Objective 5.5, Policy 5.5.4, Objective 5.6, Policy 5.6.1, and Policy 5.7.1 of the Framework Element; the Land Form and Scenic Vista Objective and Policy of the Conservation Element; and Policies 11.2 and 11.4 of the Mobility Plan. The comment states that although the Mobility Plan includes policies to address scenic corridors, the City has yet to develop Scenic Corridor Plans, including a Scenic Corridor Plan for Laurel Canyon, and the City does not apply its Interim Guidelines. The comment asks how the Proposed Plan can be consistent with the Mobility Plan and how impacts are less than significant if the Proposed Plan does not require the preparation of a Scenic Corridor Plan for Laurel Canyon. The comment states that the EIR needs to include a mitigation measure requiring the timely preparation of a Laurel Canyon Parkway Specific Plan or Laurel Canyon Scenic Corridor Plan and a moratorium on development along the scenic corridor until such a plan is in place.

The aesthetic objective and policy in the Conservation Element that are applicable to the Proposed Plan are listed in Table 4.1-1 on page 4.1-4 of the EIR. The Community Plan includes policies and implementation programs that aim to protect natural terrain and landforms, unique site features, scenic highways, and panoramic public views within the CPA, consistent with the Citywide Conservation Element. The applicable Community Plan policies include the following:

- Policy LU2.3 states that the protection of public views that are visible from public roadways and parklands be a consideration when reviewing discretionary development proposals in the hills and foothills.
- Policy LU2.5 would consider the existing built character of distinctive hillside neighborhoods when reviewing discretionary development proposals.
- Policy M7.1 supports programs that encourage the identification and preservation of scenic highways.
- Policy M7.2 encourages development adjacent to a scenic highway to integrate public view protection of scenic vistas to the maximum extent feasible and be adequately landscaped to soften the visual impact of development, where appropriate, development should provide access, hiking or biking trails, a turn out, vista point or other complementary facility.
- Implementation Program P4 involves the consideration of developing a Ridgeline Protection Ordinance to preserve the contours of natural ridgelines and continue to study hillside regulation.

The following explains how the Community Plan complies with Policy 5.1.1, Objective 5.5, Policy 5.5.4, Objective 5.6, Policy 5.6.1, and Policy 5.7.1 of the Framework Element; and Policies 11.2 and 11.4 of the Mobility Plan:

Framework Element

- Policy 5.1.1 – Use the Community Plan Update process and related efforts to define the character of communities and neighborhoods at a finer grain than the Framework Element permits.

  The Community Plan Update specifically addresses the character of neighborhoods in the Hollywood CPA in several chapters of the Community Plan, including Chapter 3: Land Use & Urban Form and Chapter 5: Preservation.

- Objective 5.5 – Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.

  The Community Plan provides goals, policies and implementation programs to address the public realm in Chapter 4: Public Realm, Parks, and Open Space of the Community Plan. The Community Plan addresses land use in Chapter 3: Land Use & Urban Form.

- Policy 5.5.4 – Determine the appropriate urban design elements at the neighborhood level, such as sidewalk width and materials, street lights and trees, bus shelters and benches, and other street furniture.

  The Public Realm subsection of Chapter 4 of the Community Plan contains a variety of policies that identify urban design elements that are appropriate for the CPA. These policies include, but are not limited to, Policy PR1.1 (encourage wider sidewalks along Boulevards and Avenue), Policy PR1.5 (improve available rights-of-way through the CPA with landscaping, benches, and walkways and bikeways for low-intensity recreational uses), Policy PR1.8 (encourage projects to incorporate pedestrian amenities that make walking convenient, safe, and practical), Policy PR1.14 (support the establishment of street lighting districts to restore character street lights and fixtures), Policy PR1.15 (design streets that are safe, well landscaped, and are pleasant and appealing to pedestrians), and Policy PR1.15 (preserve distinctive street features, such as wide landscaped parkways, landscaped medians, special paving, and street lights to enhance walkability). Implementation Program P21 of the Proposed Plan specifies that the width of sidewalks be a minimum of 15 feet along Boulevards and Avenues with high levels of pedestrian traffic.

- Objective 5.6 – Conserve and reinforce the community character of neighborhoods and commercial districts not designated as growth areas.

  The Proposed Plan directs growth away from low-density neighborhoods and directs growth to transit hubs and corridors. The Community Plan provides policies that aim to conserve and reinforce the community character of neighborhoods and commercial districts including, Policy LU1.1 (maintain the distinguishing characteristics of Hollywood's residential neighborhoods), Policy LU1.4 (limit density in hillside areas), Policy LU2.1 (preserve stable single-family zoned residential neighborhoods by presenting out-of-scale development), and Policy LU6.5 (promote the preservation and reuse of existing buildings). There are no Active Change areas in the hillsides. All growth accommodated by the Proposed Plan has been directed away from the hillsides (Figure 3-6A).

- Policy 5.6.1 – Revise community plan designations as necessary to conserve the existing urban form and community character of areas not designated as centers, districts, or mixed-use boulevards.

  The Proposed Plan amends a number of General Plan land use designations and zoning to reflect existing uses on a site, or to maintain the form and character of the neighborhood. For example, revisions are proposed in selected multi-family residential areas adjacent to or near historic districts, such as near the Whitley Heights HPOZ, the Selma-Labaig historic district, or near Serrano Avenue south of Sunset Boulevard in East Hollywood. The Proposed Plan is designating a portion of Sunset Boulevard west of La Brea Avenue and additional portions of Melrose Avenue between La Brea Avenue and Highland Avenue as Neighborhood Districts under the Framework Element.

- Policy 5.7.1 – Establish standards for transitions in building height and for on-site landscape buffers.

  The Proposed Plan includes several zone changes that address transitions in building height as well as policies that encourage transitional building heights and landscaping, such as Policies LU1.3, LU2.2, LU3.2, and LU5.8.

The comment references two policies from the City's previous Transportation Element, which has since been replaced with the adoption of the Mobility Plan 2035, the City's Mobility Element adopted in 2016. The two referenced policies are not included in the Mobility Plan 2035. Mobility Plan 2035, however, does address Scenic Highways in Chapter 2: World Class Infrastructure and has Scenic Highway Guidelines as an appendix.

The EIR concluded a less than significant impact to aesthetics and therefore there is no need for a mitigation measure. Please see the discussion under Impact 4.1-1 on pages 4.1-29 through 4.1-32 in Section 4.1, Aesthetics, of the EIR. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis or mitigation measure(s) and no further response is required (CEQA Guidelines Section 15204(c)).

Response 36-23

The comment states that the potential for aesthetic impacts to the Hollywood Hills remains because the Community Plan does not define or conserve the character of the Hollywood Hills communities and neighborhoods at a finer grain than the Framework Element through implementation programs, and/or does not make possible public view or other access to unique features or scenic views.

The Community Plan contains implementation programs that address the hillsides within the CPA, which includes Hollywood Hills. These implementation programs include:

- P2 Maintain and enforce the City's Baseline Hillside Mansionization Ordinance, The Oaks' hillside zoning restrictions, and the Mulholland and Hollywoodland Specific Plans.
- P3 Study hillside neighborhoods, including the Laurel Canyon, Nichols Canyon, Doheny Sunset Plaza and Los Feliz neighborhoods, to protect single-family neighborhoods in the hillsides from out-of-scale "mansionized" development.
- P4 Consider the development of a Ridgeline Protection Ordinance to preserve the contours of natural ridgelines and continue to study hillside regulations.
- P5 Consider design standards to protect hillside neighborhoods from over-sized development, and further study R1 variation zones in the hillsides based on physical features such as lot size and slope.
- P146 Consider amendments to the existing Hillside Construction Regulations (HCR) to address enforcement; coordinate hauling and grading activities; and clarify public and private street improvements standards. Expand application of HCR as appropriate.

Additionally, the impact discussion in Section 4.1, Aesthetics, of the EIR address how the Proposed Plan would affect scenic views and visual quality of the single-family residential uses in the hillsides, which includes Hollywood Hills. The EIR specifically addresses scenic vistas provided at two designated public vantage points, both of which are located within the Hollywood Hills (Jerome C. Daniel Overlook and Universal City Overlook), as these public vantage points generally represent the public scenic views available in other publicly accessible locations in the Santa Monica Mountains and hills within the CPA.

City Planning is preparing a Ridgeline Protection Ordinance in response to a City Council Motion, CF 11-1441-S1, that would better preserve and protect the City's ridgelines. This is a separate work program to create a Ridgeline Protection Supplemental Use District (SUD). Staff members working on this ordinance have drafted requirements for two different protection levels that could be applied to ridgelines. Level 1 would preserve existing natural ridgelines with strict regulations to provide buffers around the ridgelines, and

Level 2 would limit further degradation of developed ridgelines with development limitations that focus on scale and compatibility. Once established and adopted, the Ridgeline Protection SUD could be applied within Community Plan Areas. To sign up for more updates on this proposed ordinance, please visit planning.lacity.org/about/email-sign-up.

The Proposed Plan includes only a few Change Areas in the Hollywood Hills, and no Active Change Areas (Figure 3-6A). The Change Areas in the Hollywood Hills generally involve General Plan land use designation and/or zone changes that would reflect existing uses that are on the sites of the proposed Change Areas, such as for open space conservation. The Proposed Plan does not include any changes that would encourage, incentivize or result in development in the Hollywood Hills or change the character of Hollywood Hills or otherwise exacerbate existing development pressures within the Hollywood Hills such as those described in the comment. See **Master Response No. 9 – Hillsides**. Single-family development in hillside areas is a part of the development pattern in the City of Los Angeles. The City regulates hillside development through a variety of mechanisms including the Baseline Hillside Mansionization Ordinance and the R1 single-family citywide regulations in effect since March 17, 2017, and as applicable, Specific Plans, and Site Plan Review. The R1 single-family regulations in designated Hillside Areas reduces the residential floor area ratio from 0.5:1 to 0.45:1 for the lowest slope band (0 to 14.99 percent); see Table 12.21 C.10-2a of the LAMC. In addition, the guaranteed minimum residential floor area is reduced from 1,000 square feet to 800 square feet; see Table 12.21 C.10-3 of the LAMC. Grading quantities and hours of operation for earth import and export activities were also further restricted; see Table 12.21 C.10-6 of the LAMC, and import/export activity hours were also further restricted to only take place between 9:00 a.m. and 3:00 p.m. Monday through Friday, 12.21 C.10.(f)(2). Some hillside communities are also within Hillside Construction Regulation (HCR) districts, which addresses construction-related restrictions and includes a Site Plan Review threshold for large, single-family projects. The Proposed Plan is adding additional Hollywood hillside communities on both sides of the US-101 Freeway to a new HCR district. Regarding current development occurring in the Hollywood Hills, the purpose of the EIR is identify the potentially significant impacts of the Proposed Plan on the environment, rather than how existing development is affecting the environment. The Proposed Plan does not change the allowed land use, zoning or development standards in the hillsides. The existing plans and zoning allow development and redevelopment in hillside areas. The City continues with the Proposed Plan to implement increasing controls on such hillside development as discussed above.

The Proposed Plan accommodates forecasted growth outside of the hillsides, including Hollywood Hills. New structures in the Hollywood Hills will be allowed under zoning and land use regulations that are unchanged by the Proposed Plan and they would continue to be required to comply with applicable hillside development regulations. As discussed on pages 4.1-28 through 4.1-31 of the EIR, the changes associated with the Proposed Plan are not expected to result in the loss of or obstruction of scenic views that are currently available within publicly accessible locations in the Hollywood Hills or alter the existing visual character of Hollywood Hills. As concluded in Section 4.1, Aesthetics, of the EIR, the Proposed Plan would result in less-than-significant impact on scenic vistas and visual character.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 36-24

The comment states that existing development standards do not protect aesthetic resources in the Hollywood Hills. The comment states that development occurring in the area is out-of-scale, alters natural topography, and is out of character because the area does not have appropriate design standards. The commenter provides photos of residential development projects and construction in zip code 90069 in Attachment A; the commenter notes that these are examples of out of scale or out of character projects and some are altering the natural topography of slopes. The commenter expresses the opinion that development would continue to result in significant aesthetic impacts if additional regulations and design standards are not provided. The

comment states that the EIR needs to identify these significant impacts and to include mitigation measures and implementation programs to address these impacts.

The hillside area that is located in zip code 90069 is generally developed with single-family houses and many were built prior to 1990 but there are still some vacant lots and houses under construction. From aerial imagery, the houses appear to be larger and are built on larger lots in the Bird Streets neighborhood in the western portion of zip code 90069 and the eastern portion of 90069 generally has smaller houses on smaller lots as a whole. The range of housing sizes varies from about 2,000 square feet to more than 15,000 square feet on lots that are about 5,000 square feet to more than one acre in size. The photos of residential projects provided in Attachment A are not labeled with any addresses. Some of the houses appear to be on the larger scale but may be allowed based on the lot size and may be similar to houses built on lots of similar size. Without knowing the addresses, the houses in the pictures could have been approved as ministerial projects and received building permits or may have discretionary entitlements. Ministerial projects meet existing standards and zoning regulations outlined in the LAMC whereas discretionary entitlements require additional review and approval. Some examples of discretionary entitlements for single-family houses in the hillsides include Zoning Administrator approval (ZAAs and ZADs) for grading, lot coverage, height, retaining walls, street access, and over-in-height fences. It is possible that the projects in the photos received such approval. Since late May 2018, single family hillside construction regulations have been in effect for part of the Hollywood hills west of the 101 freeway, including the 90069 area, per Ordinance 185491, which established the Hillside Construction Regulation district in Hollywood. It is unclear when the construction photos were taken in Attachment A as no dates were provided, the header is "Examples of Recent Construction in 90069 Area Code of Hollywood Hills."

The Proposed Plan is not increasing development opportunities in the hillsides by changing the zoning to permit additional density nor scale. It is adding a General Plan footnote to limit density on steeper slopes and expanding the HCR District as discussed in previous responses to this comment letter; see **Response 36-21** for more information and also **Master Response No. 9 – Hillsides**.

Since the Proposed Plan would not adversely affect scenic vistas and would not significantly alter the visual character of the CPA, including Hollywood Hills, which are already highly developed, no mitigation measures are necessary; refer to **Response 36-23**. The comment does not indicate the aesthetic resources present in the Hollywood Hills. Please refer to **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 36-25

The comment states that Hollywood Hills is a famous aesthetic resource, and that current development standards are degrading the existing visual character of the area. The comment states that the area is losing a large amount of soil, and development is modifying the landform. The comment states that the EIR needs to calculate the amount of soil that could be removed from the Hollywood Hills over the 20-year life of the Proposed Plan and that build out would significantly modify the landform of Hollywood Hills. The comment also states that the EIR does not identify or quantify this significant impact to Hollywood Hills.

See **Response 36-23**. The comment indicates that current development is altering the landform of Hollywood Hills and degrading the visual character. It is not possible to determine how individual properties may be developed in the future therefore an estimate of soil to be removed would be speculative. The loss of soil from future development would not substantially alter the landform of the Hollywood Hills because the relative size of reasonably foreseeable individual development/redevelopment sites is limited. Future development projects would be guided by regulatory measures, such as zoning, and the policies and implementation programs contained in the Community Plan, which aim to preserve the character and scale of hillside neighborhoods, as well as the natural resources and natural features of the hillsides. The Proposed Plan involves no Active Change areas in the hillsides (See Draft EIR Figure 3-6A). The Proposed Plan makes no changes to allowed land use, zoning, development standards to increase new housing in the hillsides. The only changes are some administrative changes to protect Open Space and expand HCR

applicability. The Proposed Plan will not incentivize, encourage, or result in new housing in the hillsides and it will not foreseeably exacerbate conditions to result in the loss of a large amount of soil in the hillside. See also **Master Response No. 9 – Hillsides**. Additionally, the Proposed Plan does not propose any changes that would significantly alter the visual character, natural resources, and natural features (such as ridgelines and slopes) of the Hollywood Hills. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required. In addition, it is not clear if the information provided by the commenter is accurate. The county document cited by the commenter indicates that the Rose Bowl would hold approximately 400,000 cubic yards of soil, not 40,000 cubic yards as presented in the comment.

Response 36-26

The comment states that the EIR failed to identify significant aesthetic resource impacts to Hollywood Hills and to include mitigation measures, including limiting grading and land from modification, maintaining prevailing home size, and further regulating the use of retaining walls. The comment indicates that specific plans for key neighborhoods in the Hollywood Hills, such as the Doheny Sunset Plaza Neighborhood Association (DSPNA), Nichols Canyon Neighborhood Association (NCNA), Los Feliz Improvement Association (LFIA), and Laurel Canyon, should be included as mitigation measures for aesthetic impacts. The comment also refers to Section I (**Comments 36-1** through **36-17**) of the comment letter for other possible implementation programs to address potential impacts on Hollywood Hills, and including those discussed in Section II (**Comments 36-18** through **36-81**) of the comment letter.

The EIR evaluates the potential environmental effects of the Proposed Plan and identifies mitigation measures when the Proposed Plan would result in a potentially significant impact on an environmental topic area. The CEQA Guidelines does not require mitigation measures if the Proposed Plan would result in a less-than-significant impact or no impact. The Proposed Plan proposes no Active Change areas in the hillsides of the CPA. No growth accommodated in the Proposed Plan has been put in the hillsides. The only changes to existing zoning and land use designations in the Proposed Plan generally include changes to the General Plan land use designation, zoning, or both to either reflect existing land uses or to maintain existing neighborhood scale. The proposed changes in the Hollywood Hills are not expected to significantly affect scenic vistas, scenic resources, and visual character. As a result, no mitigation measures were provided in the EIR. Additionally, the Proposed Plan includes policies and implementation programs that would address the character of neighborhoods in the hillsides. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

See **Responses 36-3** through **36-7**, **36-9**, and **36-21** through **36-23** for further discussion.

Response 36-27

The comment suggests that the Air Quality Element of the City's General Plan is outdated because it was adopted in 1992, and thus relying on the Air Quality Element as a means to demonstrate consistency with the SCAQMD's 2016 Air Quality Management Plan (AQMP) is inappropriate.

The SCAQMD CEQA Air Quality Handbook contains the following guidance regarding the assessment of a project's consistency with the AQMP:

> *"As part of addressing consistency with the AQMP, consistency should also be addressed with the following regional plans:*
>
> *"**Consistency with General Plans***
>
> *"Both CEQA and the California planning, zoning and development laws require projects to be consistent with the jurisdiction's General Plan. The EIR should identify if the local government has an Air Quality Element or has incorporated air quality goals and*

> *objectives into another element of the General Plan. This project should be evaluated for consistency with the appropriate element."*

The Air Quality Element was adopted as part of the City's efforts, "seeking to achieve consistency with regional Air Quality, Growth Management, Mobility and Congestion Management Plans" (Air Quality Element, page IV-1). The Air Quality Element was developed to be consistent with the original 1991 AQMP and the Growth Management Plan and Regional Mobility Plan (now the RTP/SCS). Therefore, the reference to the City's Air Quality Element on page 4.3-12 of the EIR is pertinent to the discussion of the existing Regulatory Framework. It is the adopted Air Quality Element in effect for the City of Los Angeles. However, the discussion of consistency with the Air Quality Element is not used as a basis for determining consistency with the AQMP. As stated on 4.3-20 of the EIR, Threshold 4.3-1 considered consistency with the 2016–2040 RTP/SCS and the 2016 AQMP.

AQMP Consistency when Construction Could Result in Exceedances of SCAQMD Thresholds

The comment also states that the EIR did not correctly assess consistency with the SCAQMD 2016 AQMP because the assessment does not follow the specific criteria outlined in the Handbook in particular with reference to potential air quality violations (characterized by new or additional instances of the air quality standard concentrations being exceeded and the potential of delaying attainment). The Impact 4.3-1 analysis in the EIR provides an appropriate assessment of AQMP consistency and references the full SCAQMD CEQA Air Quality Handbook consistency criteria in a footnote on page 4.3-20 of the EIR.

The assessment of Project impacts in the EIR was prepared at the programmatic level for the entire Hollywood CPA for a development timeframe spanning 24 years from 2016–2040. Evaluating specific development of individual projects is not practically possible as there is no comprehensive timeline on a project-by-project basis within the 13,962-acre CPA over the 24-year period. The anticipated timing of land use changes and new development would be speculative. The EIR evaluates reasonably expected development through the year 2040 consistent with SCAQMD guidance. The City cannot reasonably anticipate if growth would be linear or sporadic between 2016 and 2040, nor can the City attempt to characterize how many individual projects may be undergoing construction at any given time.

The analysis of construction emissions presented in the EIR identifies emissions for several example project scenarios in order to provide examples of the type of activity that could occur. But the number of such project scenarios each year is not reasonably foreseeable. In addition, these project scenarios are not compared to existing construction activity in the CPA that is already occurring.

Construction activities are occurring within the CPA under existing conditions, but there is no reasonable methodology to determine the incremental effect of implementing the Proposed Plan on average or maximum daily construction activity (i.e., the change in daily construction equipment hours of use or change in daily construction vehicle miles traveled). Each individual project developed within the CPA is, and would continue to be, subject to environmental review consistent with City requirements and would be required to demonstrate consistency with the AQMP as applicable.

In preparing the AQMP, the SCAQMD takes in to account anticipated construction activities as one sector of the economy that occurs within the region.

Further, there is no correlation between individual instances of exceeding SCAQMD thresholds and potential air quality violations. The potential for violation of air quality concentrations is determined at the project level by complex dispersion modeling based on site specific information and characteristics, and at the regional level by even more complicated modeling that takes in to account numerous factors; see Appendix N for a discussion of these models. Appendix N discusses project emissions and their relationship to instances of the air quality standards being exceeded at the local or regional level:

> *"[Once a project's emissions enter the environment, these emissions are subject to a number of complex factors and variables, including chemical changes, dispersal, and weather variation, and ultimately combine with other existing conditions to result in the regional ambient air quality and concentrations of pollutants.*
>
> *"... The SCAQMD conducts regional-scale modeling in order to evaluate regional-scale air pollution, including modeling for the AQMP, modeling attainment demonstrations, and the Multiple Air Toxics Exposure Studies (MATES). This involves a regional scale photochemical model such as CAMx and CMAQ, which have a modeling domain on the order of hundreds of kilometers. The effort, resources, and availability of necessary input data required to perform this type of analysis is complex and extensive, and infeasible for smaller projects...*
>
> *"The computer models (e.g., CMAQ modeling platform) used to simulate and predict an attainment date for ozone are based on regional inventories of precursor pollutants and meteorology within an air basin. At a very basic level, based on gross assumptions appropriate for regional-scale analysis, the models simulate future ozone levels based on predicted changes in precursor emissions basin wide. It should be noted that it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region.* ***The computer models are not designed to determine whether the emissions generated by an individual development project, or even emissions from most relatively small-scale areas such as specific plan areas or community plan areas, will affect the date that the air basin attains the ambient air quality standards.****"*

It is noted that in evaluating the AQMP itself, the Program EIR for the 2016 AQMP determined that construction activities associated with the AQMP were consistent with the AQMP despite identifying daily air pollutant emissions during construction activities that would exceed the SCAQMD mass daily thresholds of NOx. The 2016 AQMP Program EIR utilized a similar approach to that which was used in this Hollywood Community Plan EIR, assessing the combination of multiple projects that may be under construction at any particular time within the South Coast Air Basin without analyzing a specific construction emissions scenario for the entire project area. The Program EIR acknowledged that, "an analysis of local air quality impacts for criteria pollutant emissions is not applicable to regional projects such as local general plans, specific plans, or AQMPs because the details of the individual projects to implement these types of plans and their locations are not known" (Program EIR, page 4.1-19). Based on SCAQMD reasoning, an assessment of potential air quality violations resulting from implementation of the Proposed Plan is not practical and would not provide any informational value.

Consistency with Assumptions in the 2016 AQMP

The analysis presented in the EIR under **Impact 4.3-1** focuses on the Project's consistency with regional growth projections that formulate the basis of the AQMP emissions inventory and attainment demonstration, as the primary effects of the Project would be accommodating future growth strategically near transit hubs and job centers to reduce daily trips and trip lengths relative to developments in other part of the city that do not have similar degrees of public transit accessibility and multimodal transportation options

The comment suggests that the EIR analysis should consider the cumulative effects of the Project in conjunction with the Measure JJJ TOC Guidelines and the statewide ADU regulations, and claims—without evidence or substantiation—that the anticipated combined population and housing growth would likely be in excess of the SCAG projections for the entire city and therefore would be inconsistent with the assumptions included in the 2016 AQMP. This portion of the comment concludes that the EIR does not adequately characterize population and housing growth in Section 4.10, Land Use and Planning, because it does not

address the effects of the Measure JJJ TOC Guidelines and the statewide ADU regulations in combination with the Project.

The AQMP assesses the South Coast Air Basin's attainment status by estimating trends in regional emissions. The AQMP is based on regional growth anticipated by SCAG in their RTP/SCS. The housing, population and employment assumptions used by SCAQMD to estimate regional emissions in the AQMP are obtained from SCAG projections for cities and unincorporated areas within the SCAMQD's jurisdiction. SCAG adopts their forecasts at the jurisdictional level. That is, they adopt their forecast for the entire City, not for a Community Plan Area. Through the Hollywood Community Plan (and other Community Plans as they are updated), the City seeks to distribute growth consistent with RTP/SCS policies[50] – namely in proximity to high quality transit and existing employment centers.

The SCAG region, including the City of Los Angeles is experiencing a housing crisis with inadequate supply of units especially at lower-income levels. The most recent Regional Housing Needs Assessment (RHNA) documents this need. The RHNA identifies a regional need for 1.3 million units, of which 836,000 units (or 62%) are identified as "existing need." This existing need is latent demand *within the existing population* that results from overcrowding and cost burden on lower income households. That is to say housing constructed in response to the existing need would not increase the population. The Measure JJJ TOC Guidelines and the statewide ADU regulations were promulgated to substantially address this dire existing need for housing. Based on the regional housing need SCAG allocated the City of Los Angeles 456,643 housing units for the period 2021–2029 (SCAG 6th Cycle Final RHNA Allocation Plan, July 2021). While the Measure JJJ Guidelines and ADU regulations would provide augmented mechanisms through which housing could be constructed within the City they are not anticipated to result in additional population growth to the City or to the SCAG region beyond what is already anticipated by SCAG in each successive RTP/SCS (and therefore included within the corresponding AQMP). The SCAQMD CEQA Air Quality Handbook recommends that projects such as General Plans and Specific Plans rely on AQMP assumptions related to population growth and the RHNA to evaluate AQMP consistency. The Measure JJJ TOC Guidelines and ADU regulations would enhance the region's abilities to provide the housing that is so desperately needed as demonstrated through the RHNA. The Proposed Plan would not result in the City exceeding SCAG 2040 (or the more recent 2045) population or employment projections. Therefore, the Proposed Plan would not exceed the assumptions in the AQMP. See also **Master Response No. 2 – Population, Housing and Employment**.

It should be noted that SCAG updates their growth forecast every four years (in connection with the RTP/SCS process) consistent with input from local jurisdictions. In general SCAG attempts to provide local estimates of population increases consistent with regional policy and local input. As local agencies update their plans to address regional policy and other issues, the local input is then provided to SCAG, and SCAG then updates their forecasts accordingly for the next RTP/SCS cycle. The Proposed Plan implements State, regional and local polices to reduce vehicle miles travelled and greenhouse gas emissions in the region. By increasing density in the Hollywood CPA it is anticipated that growth elsewhere in the City and SCAG Region would not occur (because total growth in the City/Region is considered to be constant for the year 2040). The AQMP addresses the entire air basin and would not be impacted by increasing density in one area of the City over another. As discussed above, consistent with RTP/SCS policies, the City is planning for more density in the Hollywood CPA, where there has been substantial investment in transit and where there is an existing employment center.

[50] Such polices are contained within the 2012, 2016 and 2020 RTP/SCS documents. The RTP/SCS is updated every four years and with each update policies (and modeling assumptions) increasingly focus on further concentrating growth in proximity to high quality transit and employment centers.

For purposes of understanding the context and scale of emissions, we provide the following. The 2016 AQMP displays pollutant emissions for year 2031 (page 3-26) which is nine years earlier than the Plan horizon year. This is the latest year assessed in the AQMP. The table provided below compares regional emissions estimated in the AQMP to the change in regional emissions resulting from implementation of the Proposed Plan (EIR Table 4.3-10). The comparison demonstrates that growth associated with the Proposed Plan would be a negligible component of the emission projections identified in the 2016 AQMP.

REGIONAL EMISSIONS COMPARISON BETWEEN THE PROPOSED PLAN AND THE AQMP

Scenario	Emissions (Tons per Day)				
	VOC	**NO_X**	**CO**	**SO_X**	**$PM_{2.5}$**
AQMP Projections	345	214	1,188	18	65
Proposed Plan Increase Over Future No Project/Existing Plan /a/	0.14	0.04	0.11	0.00	0.01

Note: PM_{10} emissions are not shown on page 3-26 of the 2016 AQMP for Year 2031.
/a/ Converted from pounds per day shown in Table 4.3-10 of the EIR to tons per day. The AQMP presents emissions in tons per day.
SOURCE: TAHA, 2019.

Lastly, the commenter does not provide substantial evidence to support the conclusion that the Proposed Plan together with Measure JJJ and ADU regulations will result in population growth above that planned for in the RTP/SCS and the AQMP.

Response 36-28

The comment suggests that implementation of the Proposed Plan could result in an increase in the frequency or severity of air quality violations, and therefore, would be inconsistent with the assumptions in the AQMP. Regarding consistency with the AQMP see **Response 36-27** above.

Impact Statement 4.3-2 on page 4.3-21 of the EIR assesses the potential for air quality violations based on compliance with the SCAQMD project-level significance thresholds. It is relevant to note that the State Office of Planning and Research (OPR) has removed the Appendix G question related to air quality violations from the CEQA Guidelines.

The assertion that the Proposed Plan would increase the frequency or severity of air quality violations within the South Coast Air Basin is unsubstantiated. All construction and operational activity spurred by implementation of the Proposed Plan would be conducted in accordance with the provisions of the SCAQMD Rule Book, and there is no evidence to suggest that air pollutant emissions resulting from construction or operation of the Proposed Plan would result in instances of ambient air quality standards being exceeded more frequently. As indicated in **Response 36-27**, the 2016 AQMP Program EIR identifies emissions associated with construction activities that would exceed the SCAQMD mass daily thresholds but the project was still determined to be consistent with the AQMP and would not obstruct attainment of the air quality standards on the demonstrated timeline.

As discussed in **Response 36-27** (with reference to construction emissions, but the same discussion applies to both construction and operational emissions) there is no meaningful method of correlating pollutant emissions increases resulting from implementation of the Proposed Plan to an increase in the frequency or severity of air quality violations. Although the Hollywood Community Plan EIR indicates that volatile organic compound (VOC) emissions associated with consumer products use could exceed the SCAQMD regional thresholds during operations, the calculations utilized to prepare the analysis do not account for reductions in the VOC content of consumer products that are occurring as a result of California Air Resources Board (CARB) regulations enacted at the state level. As an example, to achieve the South Coast Air Basin VOC reductions that were committed to in the AQMP, CARB is proposing to reduce VOC content limits on manual aerosol air fresheners from an existing VOC content standard of 20–30 percent down to five percent (approximately 80 percent reduction), a limit on personal fragrance products from an existing VOC

content standard of 75 percent down to 50 percent (approximately one-third reduction), and limits on aerosol crawling bug insecticide from an existing VOC content standard of 15 percent down to six percent (approximately 60 percent reduction). Therefore, operational VOC emissions for the Proposed Plan in 2040 identified in the EIR are likely overestimated by a considerable margin and do not account for future VOC reductions in consumer products relative to existing conditions.

In conclusion, as discussed in **Response 36-27**, implementation of the Proposed Plan would be consistent with the RTP/SCS and therefore the AQMP and would not result in an increase in the frequency of air quality violations and impacts have been accurately and adequately disclosed in the EIR.

Response 36-29

The comment states that the EIR provides a general discussion of health impacts associated with various pollutants but does not identify the health effects and more specific discussion per *Sierra Club v. County of Fresno* (Friant Ranch, L.P.).

A portion of the EIR was re-circulated on October 31, 2019 including a new appendix, Appendix N, Air Quality and Health Effects, was released on October 31, 2019 as well for a 45-day public comment period. The new appendix explains the associated health effects with various criteria pollutants and why it is not feasible to relate the expected adverse air quality impacts from the Proposed Project to likely health consequences.

Response 36-30

The comment states that the EIR does not adequately describe or provide mitigation for biological resource impacts in other parts of the Project Area away from Griffith Park. The comment states that the biological resources analysis is generic and does not allow for informed decision making and public participation. The comment also states that biological resource impacts in the Santa Monica Mountains west of US-101 and I-5 within the Project Area are not identified, and disclosure of relevant information is not being provided. The comment cites CEQA Guidelines Section 15151 as stating, "[a]n adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternative at the core of the EIR." The comment also states that in *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland*, the court noted that "an EIR's designation of a particular adverse environmental effect as 'significant' does not excuse the EIR's failure to reasonably describe the nature and magnitude of the adverse effect."

The full context of Section 15151 of the CEQA Guidelines states the following:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

In regards to *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners of the City of Oakland*, the EIR labeled toxic air contaminants (TAC) effects as significant without accompanying analysis of the project's impact on the health of the Airport's employees and nearby residents, which the court found to be inadequate to meet the environmental assessment requirements of CEQA. The court found that information on TAC that are of vital interest to decision makers and the public were omitted and, in other instances, the information provided was either incomplete or misleading. Additionally, the court stated that the EIR failed to support its many conclusory statements by scientific or objective data. The Final EIR for that project did not contain references to any materials that were supplied by the public during the review of the EIR indicating that accepted risk assessment protocols existed and had been used on other airports.

The EIR for the Proposed Plan appropriately provides a programmatic analysis. The Proposed Project is a plan and not an individual development project. A detailed biological survey would be undertaken as part of the analysis of a development project but it is not appropriate for the analysis of a plan that includes 13,962 acres or 21.8 square miles, approximately 38 percent of which is open space land use. The degree of analysis in the EIR is appropriate to that of a plan. The EIR analysis uses available information to analyze biological resources impacts. Sensitive species that have been documented by CNDDB were identified and discussed individually in the EIR. Additionally, the mitigation measures for biological resources apply to the Santa Monica Mountains portion of the Plan Area east and west of the US-101, as well as the area surrounding Griffith Park. Please see **Master Response No. 7 – Biological Resources**.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 36-31

The comment suggests discussion of the Rim of the Valley Corridor Special Resources Study as it applies to the Project Area to be included under the Regulatory Framework subsection of Section 4.4, Biological Resources, of the EIR.

Please see **Master Response No. 7 – Biological Resources**.

Response 36-32

The comment states that the EIR does not provide an adequate description of the Santa Monica Mountains Conservancy Act. The comment notes that the Act established the Santa Monica Mountains Zone, within which a portion of the Project Area is located and is codified in Section 33001 *et. seq.* of the PRC. The comment indicates that the EIR should explain that the Santa Monica Mountains Zone is an environmental resource of critical concern that has been designated, precisely mapped, and officially adopted pursuant to State law. The comment cites partial text from the Santa Monica Mountains Conservancy Act to conclude that the Act identifies biological resource impacts as resulting from current governmental permitting practices within the Santa Monica Mountains Zone, and requests that the Proposed Plan should address these deficiencies, and address them through mitigation measures. The comment draws a conclusion that the Conservancy is the chief state-planning agency for the Santa Monica Mountains and that the views of the Conservancy regarding potential biological resource impacts and habitat and habitat linkages within the Santa Monica Mountains Zone should be respected.

A discussion of the Santa Monica Mountains Zone has been added to the EIR. Please see **Chapter 4.0, Corrections and Additions**, for page 4.4-4 of the EIR. The Santa Monica Mountains Zone generally comprises the Santa Monica Mountains, and page 4.4-7 of the EIR identifies and discusses biological resources found within the Santa Monica Mountains Zone portion of the Plan Area.

The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for providing additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 36-33

The comment states that pages 4.4-7 and 4.4-8 of the EIR should discuss the findings of the Rim of the Valley Corridor Special Resources Study and the Wildlife Pilot Study as they apply to the Plan Area for habitats and sensitive species.

Please see **Master Response No. 7 – Biological Resources**.

Response 36-34

The comment states that the EIR should include maps of wetlands, streams, waterfalls, and riparian habitat within the Plan Area. The comment indicates that pages 4.4-11 and 4.4-12 of the EIR should discuss the findings of the Rim of the Valley Corridor Special Resource Study and the Wildlife Pilot Study as they apply to the Plan Area for wetlands, streams, and riparian habitat. The comment asserts that the discussion of resources in the portion of the Santa Monica Mountains west of US-101 and I-5 is inadequate and not detailed enough to allow for the identification of potential impacts and therefore, impacts are understated and mitigation not provided. The comment also states that the EIR should discuss the presence and importance of Nichols Canyon Stream, and provide the types of species that can be found near the stream.

Section 4.4, Biological Resources, of the EIR identifies the portions of the Los Angeles River near the I-5/SR-134 interchange and east of I-5, as well as various areas within the Santa Monica Mountains as containing wetlands and/or riparian habitat. Seasonal and perennial streams that can be found within the Santa Monica Mountains in and surrounding the Project Area contain or have the potential to contain year-round or intermittent wetlands and riparian vegetation. The EIR appropriately provides a programmatic analysis of the potential for impacts to biological resources in the Plan Area. It is infeasible to identify and map all biological resources including wetlands, streams, waterfalls, and riparian habitat within the Project Area due to the size of the area, drought and fluctuating conditions. While the US Fish and Wildlife Services (USFWS) maps wetlands and riparian areas, a wetlands/riparian area figure using the USFWS Wetlands Mapper was not included in the EIR because the map is not accurate for use at this scale. The objective of the Wetlands Mapper is to produce reconnaissance level information on the location, type and size of wetlands. The maps are prepared from the analysis of high-altitude imagery and wetlands are identified based on vegetation, visible hydrology, and geography. Wetlands may have changed since the date of the imagery and/or field work due to natural processes or human related activity. Additionally, the riparian areas are mapped at a national level across a broad spectrum of semi-arid landscapes, and the map may not identify all federally-protected wetlands and riparian habitats within the Project Area.[51] For example, the USFWS Wetlands Mapper does not identify the portions of Los Angeles River near the I-5/SR-134 interchange and downstream of Colorado Boulevard as containing riparian habitats. According to USFWS *A System for Mapping Riparian Areas in the Western United States* (2009), time of year, climatic or meteorological conditions, and other factors may influence what is identified, classified and mapped as riparian.

Although it is not appropriate in a programmatic EIR to identify and map all biological resources including wetlands, streams, waterfalls, and riparian habitat within the Project Area, it should be noted that the EIR includes Mitigation Measures **BR-3** through **BR-5** to ensure that all potential wetlands and riparian habitat are protected, even if these bodies of water have not yet been documented.

Please also see **Master Response No. 7 – Biological Resources**.

Response 36-35

The comment states that the discussion of wildlife corridors on pages 4.4-13 and 4.4-14 of the EIR is inaccurate and needs to be corrected and updated. The comment also states that the EIR should discuss the finding of the Rim of the Valley Corridor Special Resources Study and the Wildlife Pilot Study as they apply to the Project Area. The comment further states that the EIR needs to discuss the Santa Monica Mountains Conservancy adopted East Santa Monica Mountain Habitat Linkage Map (Resolution No. 17-01); a portion of the text from the resolution is provided in the comment.

[51] USFWS, *National Wetlands Inventory: Data Limitations, Exclusions and Precautions*, https://www.fws.gov/wetlands/Data/Limitations.html, accessed April 8, 2019.

The East Santa Monica Mountain Habitat Linkage Map has not been included in the EIR because the City has found that the map cannot be supported with substantial evidence as there is no information to verify that the map was prepared by biologists and was prepared using methods and techniques to ensure the accuracy and completeness that would make it a reliable source to identify wildlife corridors. Please see **Master Response No. 7 – Biological Resources**.

Response 36-36

The comment states that the EIR should include a description and a map of the portion of the Eastern Santa Monica Mountain Habitat Linkage Planning Map. The comment states the discussion on page 4.4-13 regarding wildlife movement should acknowledge the importance of remaining habitat within the Santa Monica Mountains Zone and in the area west of the US-101 and I-5, and that the City Council voted on April 22, 2016 to direct development of a Wildlife Corridor in the Santa Monica Mountains (Hillside Ordinance Zone). The commenter states that the EIR understates wildlife corridor impacts and does not provide feasible mitigation.

See **Response 36-35** related to the SMMC linkage map. The comment itself is not substantial evidence of habitat that could include existence of flora and fauna, or a wildlife corridor. The April 22, 2016 City Council vote was to approve the City Council Planning and Land Use Management (PLUM) Committee Report to instruct City Planning to prepare an ordinance with a set of land use regulations that would maintain wildlife connectivity in the city, generally in the eastern area of the Santa Monica Mountains. A draft ordinance was released in May 2021, and it has yet to be considered by the City Council. Please see **Master Response No. 7 – Biological Resources** supporting that the City identified the special status species, habitats and wildlife corridors that could be impacted by the Proposed Plan relying on substantial evidence. Nothing in the comment supports that the City's analysis is not supported with substantial evidence.

Response 36-37

The comment states that pages 4.4-16 and 4.4-25 of the EIR fails to adequately address the potential for sensitive species in areas of the Santa Monica Mountains west of the US-101 and I-5. The comment states that the first paragraph under the discussion for Impact 4.4-1 is incorrect and pages 4.4-16 and 4.4-25 should discuss the Rim of the Valley Corridor Special Resources Study and Wildlife Pilot Study as they apply to the Project Area for sensitive species.

The Rim of the Valley Corridor Special Resources Study and the Wildlife Pilot Study are addressed in **Master Response No. 7 – Biological Resources**.

Response 36-38

The comment asks whether Table 4.4-2 of the EIR include species found in the portion of the Santa Monica Mountains west of the US-101 and I-5. The comment states that the table should include mountain lions and the EIR should discuss mountain lions because CDFW considers mountain lions as specially protected species due to the California Wildlife Protection Act of 1990 (Proposition 117). The comment also requests that the EIR should address the location of tracked mountain lions within the Project Area and the potential for habitat modification to impact mountain lions.

In accordance with Appendix G of the CEQA Guidelines, the EIR identifies and discusses potential impacts on candidate, sensitive, or special status species as identified in local or regional plans, policies, or regulations, or by CDFW or USFWS. Proposition 117 prohibits the hunting of mountain lions but it is not the same as the identification of mountain lions under the State or Federal Endangered Species Act as rare, threatened or endangered and does not prohibit all "takes." The law does in fact require the issuance of a depredation permit to kill mountain lions, which has resulted in over 100 mountain lions being killed since

the passage of the proposition.[52] In April 2020, after publication of the EIR, the CDFW provided notice that Mountain Lions are a candidate species. This means the CDFW will study whether to list cougars as a special status species under State ESA laws. The CDFW is studying and will prepare a report. After that the mountain lion will either be listed or not. If not, their candidate species designation will be removed. While the mountain lions are candidate species the ESA rules on prohibition of taking are in place. Please see **Chapter 4.0, Corrections and Additions** (for Section 4.4, Biological Resources) for an updated discussion of Proposition 117 and the candidate species designation in existing settings and the first paragraph of Impact 4.4-1 and an update to Table 4.4-2. These changes however do not amount to significant new information requiring recirculation as mountain lions were identified as a species present in the Santa Mountains in and around the Project Area. On page 4.4-7 of the EIR describing the existing setting for Wildlife Habitats:

> Many wildlife species can be found in the Santa Monica Mountains within and adjacent to the Project Area, including but not limited to … mountain lions.

Additionally, the EIR identified that special status species and wildlife, in general, could be impacted by development in the Project Area and impacts would be significant and unavoidable. (Draft EIR on pages 4.4-24 to 4.4-25; 4.4-30.)

Impact analysis for 4.4-1 provides:

> Although a majority of the developed and undeveloped open space areas have a land use designation of Open Space within the Santa Monica Mountains portion of the Project Area, the Santa Monica Mountains portion of the Project Area also contains undeveloped or underutilized areas that have land use designations of Minimum Residential, Very Low II Residential, Low I Residential, and Low II Residential (hereinafter, referred to collectively as low density single-family residential land use designations). These undeveloped and underutilized areas may contain native and non-native vegetation and are generally located on steep hillsides between low density single-family residential uses. The Proposed Project does not propose any changes to these undeveloped areas, with the exceptions of Subareas 1:5 and 70. However, given the land use designations of these areas, it is possible that new structures of other types of improvements could occur during the lifetime of the Proposed Plan Although such structures and improvements would be limited and, given the land use designations of the area, may be associated with low density single-family residential or recreational uses, development in these areas could potentially involve the removal of natural habitat or lead to habitat degradation, such as involving activities that could generate fugitive dust (such as through grading or excavation activities), increase noise or vibration, or introduce light. As a result development or improvements during the lifetime of the Proposed Plan could potentially have an adverse effect on special status species, if present in these areas. (Draft EIR on pages 4.4-18 to 4.4-19.)

Impact analysis for 4.4-4 provides:

> Undisturbed natural open space within and surrounding the Project Area is predominately found within the Santa Monica Mountains. The Santa Monica Mountains within and in the vicinity of the Project Area are part of a larger wildlife corridor encompassing the Santa Monica Mountain Range. …
>
> Within [the Santa Monica Mountains and Los Angeles River], potential development generally would be limited to improvements associated with low density residential uses and/or park and recreational uses, depending on the zoning and land use designation of

[52] https://www.sacbee.com/news/politics-government/capitol-alert/article240676261.html.

> the parcels. Disturbance to undeveloped open space areas within these areas during the lifetime of the Proposed Plan could potentially interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors with the Santa Monica Mountains and Los Angeles River.
>
> …
>
> Therefore, impacts to native resident, migratory fish and wildlife; established native resident or migratory wildlife corridors; or native wildlife nursery sites would be potentially significant. (Draft EIR on pages 4.4-29 to 4.4-30.)

Additionally, see **Master Response No. 9 – Hillsides**.

Response 36-39

The comment states that Table 4.4-2 of the EIR fails to identify the Southern California black walnut (*Juglans californica*) as a sensitive species. It states that the species has a California Rare Plant Rank of 4.2 (limited distribution in California, fairly endangered in California). The comment states that the EIR should require mitigation consistent with the Native Plant Protection Act, notification of CDFW if a sensitive native plant may be impacted by a project, and requirement for a biological resource and tree assessment for any proposed project within the Santa Monica Mountain Zone. The comment requests that the loss of mature trees be addressed as a scenic resource impact in the EIR.

The California Native Plant Society (CNPS) and CDFW maintain lists of taxa that have been evaluated for distribution, abundance, threats, and other characteristics that contribute to rarity and endangerment (e.g., CNPS Inventory of Rare and Endangered Plants). These lists include plants that have been ranked per the California Rare Plant Rank (CRPR) system, which is a ranking system originally developed by the CNPS to better define and categorize rarity in California's flora. All plants tracked by CDFW's California Natural Diversity Database (CNDDB) are assigned to a CRPR category. These categories are:

- 1A Presumed extirpated in California and either rare or extinct elsewhere
- 1B Rare or Endangered in California and elsewhere
- 2A Presumed extirpated in California, but more common elsewhere
- 2B Rare or Endangered in California, but more common elsewhere
- 3 Plants for which we need more information – Review list
- 4 Plants of limited distribution – Watch list

Taxa on the CRPR lists are evaluated by taxon experts who assign a CRPR based primarily on number of occurrences, distribution, and level of threat. CNPS and CDFW maintain that all CRPR 1 and CRPR 2 taxa meet the definition of endangered, rare, or threatened under CEQA Section 15380 and must be evaluated during CEQA review. CEQA Section 15380(b) defines a species of plant as "Endangered" when its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors; "Rare" when either: (A) Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or (B) The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered "threatened" as that term is used in the Federal Endangered Species Act.

CNPS currently considers southern California black walnut (Juglans californica) a List 4 plant (CRPR 4.2). CRPR 4 species do not meet the definition under CEQA Section 15380(b) as an Endangered, Rare or Threatened Species ("special-status"). Information for these species is often limited due to the difficulty in obtaining current data on the number and condition of the occurrences and few if any of these CRPR 4 species are eligible for state listing (CNPS, 2021). CRPR 4 plants may be considered to be rare species if they occur in less than two California counties or if they are of local concern (WRA, 2013). Moreover,

according to CNPS, southern California black walnut occurs in 12 California counties and spans over 130 USGS 7.5-minute quadrangles. CDFW does not include southern California black walnut in their State and Federally Listed Endangered, Threatened, and Rare Plants of California (CDFW, 2021). Therefore, according to both CNPS and CDFW, southern California black walnut does not meet their criteria as List 1 or 2 species or as Endangered, Threatened, and Rare Plants of California, respectively.

The City of Los Angeles identifies southern California black walnut as a protected tree species in accordance with Article 2 and 7 of Chapter I and Article 6 of Chapter IV and Section 96.303.5 of the LAMC (Ordinance 177404, "Protected Tree Ordinance"). In adopting that ordinance, the City did not make a determination that the California black walnut is rare in the City or otherwise and the City has not conducted any survey or study to make such a determination. In accordance with the Protected Tree Ordinance, the City requires that southern California black walnut trees that measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree that would be removed by a project be mitigated at a 1:1 ratio with a 15-gallon replacement tree. Based on the above, there is no evidentiary basis to find that the California black walnut is rare in the City, the County or the State.

Furthermore, assertion that a plant is rare without detailed studies can lead to unwarranted and costly expenditures for local government, non-profit groups, and other stakeholders, particularly in cases of infill development. In the case of southern California black walnut, adopted ordinances and/or policies suffice to protect and/or compensate for impacts to individual protected trees.

The mitigation measures provided in the EIR protects sensitive plant species in the Santa Monica Mountains, including those that have not yet been documented as occurring in the area. Mitigation Measure **BR-1** of the EIR requires discretionary projects within the Santa Monica Mountains to conduct a biological resources assessment to determine the presence or absence of sensitive plant and animal species. The mitigation measure requires that the biological resources assessment report and a follow-up report be submitted to DCP and CDFW prior to ground-disturbing activities. Mitigation Measure **BR-2** requires discretionary projects in the Santa Monica Mountains to provide focused surveys for special status plants if indicated as appropriate by the biological resources assessment report. This mitigation measure also requires that a special-status plant relocation plan be developed and implemented to provide for translocation of the plants. Additionally, individual projects in the Plan Area (including the hillsides, foothills, and flatlands) would be required to comply with the City's Tree Preservation Ordinance (LAMC Chapter IV, Article 6, Section 46).

As discussed on page 4.1-20 of the EIR, scenic resources contribute to the visual character of a given area and include natural or urban features. While the commenter expresses the opinion that the Southern California black walnut (*Juglans californica*) is a scenic resource, this plant species, by itself, does not notably contribute to the visual character of any area within the Plan Area. This plant species, when combined with other plant species, contribute to the overall visual character of the open space areas of the Santa Monica Mountains, which, as a whole, is identified as a scenic resource in Section 4.1, Aesthetics, of the EIR.

Response 36-40

The comment states that the biological resources discussion in the EIR is not comprehensive, as exemplified by two missing sensitive species (the mountain lion and black walnut) from Table 4.2. The comment states that a detailed biological resources assessment needs to be prepared for the EIR that more accurately captures the potential for biological resource impacts. The comment requests that the EIR should identify every sensitive species that may be impacted by the Proposed Plan as a separate impact and provide species-specific mitigation, not just a conclusion of significant unmitigable impacts.

Please see **Chapter 4.0, Corrections and Additions** for an updated discussion of the first paragraph of Impact 4.4-1 and an update to Table 4.4-2. The EIR appropriately provides a programmatic analysis of the potential for impacts to biological resources in the Plan Area, please also see **Master Response No. 7 – Biological Resources**, and **Responses 36-38** and **36-39**.

Response 36-41

The comment states that Mitigation Measures **BR-1** and **BR-2** only applies to discretionary projects in or within 200 feet of Griffith Park. The comment states that the EIR needs to acknowledge and address potentially significant impacts in other areas of the Santa Monica Mountains Zone. The comment states that the significant impacts in the EIR are understated and the EIR fails to identify feasible mitigation measures for significant impacts. The comment states that Mitigation Measures **BR-1** and **BR-2**should be required for any project within the Santa Monica Mountain Zone, and in the absence of mitigation for such impacts, impacts to other areas of the Santa Monica Mountains Zone are also significant and unavoidable. The comment also refers to Section I of the comment letter for possible additional mitigation measures.

For clarification, Mitigation Measures **BR-1** and **BR-2** apply to a larger geographic area. These mitigation measures apply to discretionary projects that are in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hill Ordinance; see page 4.4-24 of the EIR. The Baseline Hillside Ordinance includes expansive areas on both sides of the US-101 within the CPA as applicable.

The following suggestions for biological resources are identified in Section I of the comment letter (**Responses 36-11** and **36-12**):

1) Include an implementation program for the preservation of habitat linkages in the Santa Monica Mountains and adoption of the Santa Monica Mountains Habitat Linkage Planning Map;
2) Include an implementation program or policy to encourage and support efforts by the City, the Mountains Recreation and Conservation Authority (MRCA), neighborhood groups, and non-profits to acquire vacant land for publicly-owned space; and
3) Include implementation programs that would allow for the designation or rezoning of land acquired by MRCA, community groups, non-profits, and resource agencies for parklands, trails, or habitat as Open Space.

In regard to the first suggestion, Mitigation Measure **BR-6** requires that discretionary projects in the Santa Monica Mountains portion of the Project Area conduct biological resources assessments that would provide site-specific measures that individual projects would be required to implement, appropriate to project-specific conditions, such that the existing wildlife corridor would remain and that wildlife corridors are not entirely closed by any individual project. The suggested mitigation measure by the commenter is similar to Mitigation Measure **BR-6** and would not lessen any significant effects that the Proposed Plan would have on wildlife corridors.

In regard to the second and third suggestions, the Proposed Plan does not involve changes that would increase development in the Santa Monica Mountains portion of the Plan Area. Rather, the proposed changes in the Santa Monica Mountains portion of the Proposed Plan would reflect existing uses and would change the residential land use designations and zoning of parcels with undeveloped natural open space to an Open Space land use designation and zoning. The General Plan Land Use Map footnote (Administrative Note No. 3) supports the redesignation of vacant land for the purpose of conservation to Open Space as appropriate: The Open Space (OS) land use designation is premised on the ownership and use of the property by a government agency, nonprofit or conservation land trust for the primary purposes of public recreation use or open space conservation. The designation of the Open Space (OS) zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency, nonprofit or conservation land trust officially determines that vacant land under their ownership is to be used as open space, the property may be redesignated and/or rezoned to Open Space (OS).

The suggested measures to acquire vacant land and to change the land use designation and zoning of acquired land would not protect sensitive biological resources from future development on individual parcels. As discussed on pages 4.4-18 and 4.4-19 of the EIR, recreation-related improvements in Open Space designated parcels could potentially occur in the Santa Monica Mountains if it complies with the zoning code. These improvements could potentially involve the removal of natural habitat or lead to habitat degradation. Therefore, the suggested measures would not lessen any significant effects that the Proposed Plan would have on biological resources. But see **Master Response No. 9 – Hillsides** explaining that the Proposed Plan will not foreseeably result in any development in the hillsides.

Please also see **Master Response No. 7 – Biological Resources** for more information. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 36-42

The comment states that Impact 4.4-2 of the EIR should discuss the findings of the Rim of the Valley Corridor Special Resources Study as it applies to the Plan Area for riparian habitats and sensitive natural communities. The commenter states that the discussion of resources is not detailed enough to allow for the identification of potential impacts, therefore, the EIR understated impacts.

The Rim of the Valley Corridor Special Resources Study is discussed in **Master Response No. 7 – Biological Resources**.

Response 36-43

The comment states that Impact 4.4-3 of the EIR should discuss the finding of the Rim of the Valley Corridor Special Resources Study and the Wildlife Pilot Study as it applies to the Plan Area for wetlands. The comment states the EIR discussion of wetlands is inadequate and broad, therefore, the impacts are understated in the EIR. The comment further states that the EIR should address the potential for impacts to Nichols Canyon Stream because there has been more aggressive development in the last three to five years to streamside and neighborhood properties, which threaten the native flora and fauna. The comment states that significant riparian and wetland impacts to Nichols Canyon Stream would occur if they are not mitigated.

Please see **Master Response No. 7 – Biological Resources**.

Response 36-44

The comment states that the EIR should discuss the finding of the Rim of the Valley Corridor Special Resources Study as it applies to the Plan Area for wildlife movement. The comment states that because DCP has not yet developed a Hillside Ordinance Zone as directed by Council motion, the EIR should acknowledge the potential for wildlife corridor impacts throughout the portions of the Santa Monica Mountains Zone within the Plan Area, require completion of the ordinance, and include mitigation measures that are identified in the City Council/PLUM motion items for projects within the Santa Monica Mountains Zone as listed by the commenter. The comment further states that the EIR should include a mitigation measure specifying that any proposed development that occurs on lots in or adjacent to mapped wildlife corridors shall be required to have a biological resource assessment, shall not be eligible for CEQA exemptions, that the SMMC shall be provided with the opportunity to review and comment on the plans, that only wildlife-friendly fences can be used, and that any easements requested by SMMC for wildlife corridor protection shall be integrated into the project plans. The comment requests that the EIR should also include feasible mitigation measures identified in the Wildlife Pilot Study.

DCP has a separate work program to prepare and create potential protection areas for wildlife as directed by City Council motion and the work program is in progress. The Council motion, which was approved by the PLUM Committee in 2016 (see Council File 14-0518), instructed DCP to prepare a Wildlife Corridor in the eastern area of the Santa Monica Mountains (Hillside Ordinance Zone). The motion instructs DCP to prepare an ordinance to: 1) require project applicants to permanently accommodate wildlife habitat connectivity as part of their development project, prior to issuance of any building or grading permits, 2) require easements and deed restrictions in perpetuity to protect wildlife habitat connectivity, 3) formally designate the area as a Regional Wildlife Habitat Linkage Zone in the Municipal Code, and 4) require a Biological Constraints Checklist as part of every new building project including a habitat connectivity and wildlife permeability review within areas of concern. The action items also instruct DCP to report on the feasibility of identifying the areas within the City that are in or within 500 feet of the Rim of the Valley Corridor Special Resources Study Area as a "Potential Regional Wildlife Habitat Linkage Zone" and to provide a system of informing all applicants of building permits and planning approvals that they are within this zone and that they should make feasible accommodations for wildlife linkages. During the approval process of any subdivision of land or lot line adjustment within this zone, DCP would require that projects accommodate wildlife linkage areas by providing map design guidelines. DCP is also to report on the feasibility of incorporating these maps and critical wildlife linkage areas into Community Plan updates. The commenter states that the action items noted in the motion should be included in this EIR as mitigation measures. During the preparation of this EIR, the ordinance and the Regional Wildlife Habitat Linkage Zone under this motion had not yet been released or adopted by the City and, thus, are not mentioned in the EIR. At the time of the publication of the Final EIR for the Hollywood Community Plan Update in 2021, DCP is currently in the process of creating wildlife protection areas and regulations in the eastern area of the Santa Monica Mountains. The approved PLUM action items are part of the process that DCP is undertaking to create Protection Areas for Wildlife (PAWS). DCP is preparing regulations that could be adapted in the future Protection Areas for Wildlife. In November 2018, DCP held a public open house to provide an overview of the work program and introduced concept regulations, including wildlife- friendly fencing, landscaping, and lighting. The proposed concepts and other regulation options are currently undergoing additional study and review. A draft ordinance was released in May 2021, as of publication of this Final EIR it has yet to be considered by the City Council. If and when the wildlife protection ordinance is adopted by the City, development within the Plan Area would be required to comply with the regulations.

Although the Wildlife Pilot Study has shared maps of wetlands, streams, and riparian habitat areas, the information is preliminary based on limited available data and is subject to change. The pilot study has not yet identified any mitigation measures. Although the commenter indicates that the EIR should include the City Council/PLUM-approved action items as mitigation measures, the ordinance as discussed previously is a separate project from the Proposed Plan and encompasses the Santa Monica Mountains that are within and outside of the Plan Area. If the action items were included as mitigation measures for the Proposed Plan, the action items would only be applicable to the Santa Monica Mountains portion of the Plan Area, and the items would not serve the City Council/PLUM's intent of implementing the action items to a broader area (i.e., all portions of the Santa Monica Mountains that are required to comply with the City's Baseline Hillside Ordinance within and outside of the Plan Area). Moreover, the City finds such a mitigation measure is infeasible as an inefficient use of City resources and that it is not desirable to wait to approve the Plan for a larger independent policy effort.

In response to the other mitigation measures the commenter suggested, the requirement that any development project on lots in or adjacent to mapped wildlife corridors be required to undergo a biological resource assessment and not be eligible for CEQA exemptions is not necessary because as stated in Section 15300.2(c) of the CEQA Guidelines states, "[a] categorical exemption shall not be used for any activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." As such, if the biological resources assessment report required by Mitigation Measures **BR-1**, **BR-2**, and **BR-6** finds that certain biological resources could be significantly affected by a discretionary project, the discretionary project would not qualify for a Categorical Exemption under CEQA.

The other suggested mitigation measure to give the SMMC the opportunity to review and comment on development plans on lots in or adjacent to mapped wildlife corridors and that any easement that they request for wildlife corridor protection be incorporated in the project plans is infeasible and as a policy it is not desirable to create a separate process for the SMMC to review and add conditions of approval to projects. Additionally, the commenter has provided no substantial evidence to support that such any of the mitigation measures are necessary or will reduce any significant impacts to biological resources.

See **Master Response No. 7 – Biological Resources** for further discussion of the mitigation measures and the studies referenced in the comment. See also **Master Response No. 9 – Hillsides**.

Response 36-45

The comment states that the EIR should include a mitigation measure to change the zoning of "paper streets" not required for primary parcel access as Open Space because they can be wildlife corridors.

The changes included in the Proposed Plan in the Santa Monica Mountains portion of the Plan Area involve changes to the General Plan land use designation, zoning, or both to generally reflect existing land uses, such as for open space conservation. The Proposed Plan would change the zoning and General Plan land use designation of open space areas that are currently not designated or zoned as Open Space to reflect its existing use as part of Griffith Park or for open space conservation. Mitigation Measure **BR-6**, which is to mitigate for impacts to wildlife corridors, would apply to individual discretionary projects that are in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance. The suggested mitigation measure would require additional investigation and study to determine where existing paper streets overlap with identified wildlife corridors. The Wildlife Pilot Study and Wildlife Ordinance, which are further discussed in **Master Response No. 7 – Biological Resources**, is a separately funded work program that will consider appropriate measures for new development projects to accommodate wildlife linkage areas. A new policy, PR3.4, has been added to support the re-zoning of paper street for open space easements. Please see the Community Plan in Final EIR Updated **Appendix D**. Any additional mitigation measures at this time related to paper streets is infeasible as an inefficient use of City resources.

Response 36-46

The comment states that the EIR acknowledges the potential for significant wildlife corridor/movement impacts for projects in or within 200 feet of Griffith Park, and has Mitigation Measure **BR-1** and **BR-2**, but does not recognize the potential for impacts in the area west of the US-101 and I-5 and other portions of the Santa Monica Mountains Zone in the Plan Area. The comment states that the potential for significant unmitigated impacts to wildlife corridors and movement west of the US-101 and I-5 remains.

The comment is inaccurate. See **Response 36-38**. Impacts discussed in the EIR to wildlife corridors are not limited to 200 feet of Griffith Park but identify all of the Santa Monica Mountains and the Los Angeles River in and around the Proposed Plan area. Additionally, Mitigation Measures **BR-1** and **BR-2** would apply to individual discretionary projects that are located than in or within 200 feet of Griffith Park or are required to comply with the City's Baseline Hillside Ordinance. The Baseline Hillside Ordinance includes expansive areas on both sides of the US-101 within the CPA as applicable. Please also see **Master Response No. 7 – Biological Resources**.

Response 36-47

The comment states that Impact 4.4-5 should discuss issues with the adequacy of policies and ordinances, including the City's Tree Ordinance, to protect against the loss of tree resources in the Plan Area.

The EIR analyzes environmental impacts using the threshold in Appendix G of the CEQA Guidelines of whether the Proposed Plan would conflict with any local policies or ordinances protecting biological resources. The EIR discusses on page 4.4-31 how the Proposed Plan would be consistent with the applicable

policies contained within the General Plan Framework Element and the Tree Preservation Ordinance. As discussed, the Proposed Plan is consistent with the applicable policies set forth in the General Plan Framework Element, and the Proposed Plan does not include components that would preclude implementation of or alter the requirements and procedures contained under the Tree Preservation Ordinance. Future development occurring within the Plan Area would be required to comply with the City's Tree Preservation Ordinance. The EIR concluded that impacts related to local policies or ordinances protecting biological resources would be less than significant. The commenter does not provide any substantial evidence to support the need for new or additional analysis under Threshold 4.4-5.

Response 36-48

The comment states that Impact 4.4-6 should discuss whether the Proposed Plan would be consistent with the recommendations of the Rim of the Valley Corridor Special Resources Study as they apply to the Plan Area.

Impact 4.4-6 asks if implementation of the Proposed Plan would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As discussed on page 4.4-32 of the EIR, no approved local, regional, or state habitat conservation plans (HCPs) are located within or near the Project Area. Designated under the Endangered Species Act Section 10(a)(1)(B), HCPs are federal planning documents that are required as part of an application for an incidental take permit when a project will affect a listed and non-listed species (e.g., species that are candidates or have been proposed for listing). An HCP details how impacts on a species will be minimized or mitigated, and how the HCP is to be funded. Natural Community Conservation Plans (NCCPs) are CDFW's approach to plan for the conservation of declining species, natural communities, and supporting ecological processes while allowing compatible and appropriate economic activity.

The Rim of the Valley Corridor Special Resources Study is neither an HCP nor an NCCP. Rather, it is a study to evaluate whether any portion of the Rim of the Valley Corridor study area is eligible to be designated as a unit of the national park system or added to an existing national park. Additionally, this study does not identify any HCPs or NCCPs within the Plan Area. Please also see **Master Response No. 7 – Biological Resources**.

Response 36-49

The comment states that the Land Use EIR comments are made throughout the letter, including Section I of the comment letter.

For Section I comments, refer to **Responses 36-3** through **36-17**.

Response 36-50

The comment states that the EIR inappropriately classifies emergency response plan and wildland fire impacts as less than significant.

The comment does not present substantial evidence to support the claim that the EIR impact findings are inappropriate related to emergency response plans and wildland fire impacts. This comment is a matter of opinion and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 36-51

The comment states that the EIR should provide more information on the definitions of VHFHS and Fire Brush Clearance Zone classifications and describe key fire incidents in the CPA.

Page 4.8-33 of the EIR discloses the presence of these fire hazard classifications in the Project Area and includes compliance requirements for properties located within these zones. The EIR also mentions several fire events on page 4.8-33 and the conditions that led to these events to further characterize potential risks of fire hazards within the CPA. This comment is a matter of opinion and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 36-52

The comment refers to the comments contained in a later comment, **Response 36-73**.

Please see **Response 36-73**.

Response 36-53

The comment states that the EIR understates the fire hazards presented by development in the hillside areas under the Proposed Plan and requests mitigation measures related to ensuring emergency vehicle access and brush clearance (additional outreach and compliance).

No Active Change Areas are proposed within the Santa Monica Mountains; however, vacant lots could be developed and some lots could be redeveloped under the existing land use and zoning designations. The Proposed Plan would direct growth away from low-density neighborhoods, including hillside areas. As such, increases in intensified development within the mountains and hillsides is not reasonably anticipated to occur with implementation of the Proposed Plan. The Proposed Plan does not include the installation of infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate wildfire risks. As discussed in the Draft EIR on p. 4.8-44, future development that could occur would be reasonably anticipated to be similar to current baseline conditions, and the Proposed Plan would not substantially exacerbate exposure of persons residing within the Project Area to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Properties located within a VHFHS Zone are required to minimize fire risks during the high fire season through vegetation clearance, maintenance of landscape vegetation to minimize fuel supply (that would spread the intensity of a fire), comply with provisions for emergency vehicle access, and use approved building materials in compliance with City and Los Angeles Fire Department (LAFD) requirements. Additionally, redevelopment in hillsides would result in potentially older buildings that do not meet current Fire Code standards being rebuilt to meet the current more strict Fire Code. See **Master Response No. 9 – Hillsides** for a discussion of Fire Code Standards, and how there is a negative correlation to increased density in the hillsides and increased wildfires.

Impacts related to emergency access and wildfire in hillsides are discussed under Impact 4.15-4 in the partially RDEIR. The new Final EIR **Appendix P** (see **Chapter 4.0, Corrections and Additions** and Final EIR Appendices), Modifications to Appendix G of the CEQA Guidelines, also addresses wildfire impacts. As discussed under the Wildfire heading in **Appendix P**, the undeveloped portions of the Santa Monica Mountains are generally designated for Open Space and, thus, development opportunities in these areas are limited. Development opportunities in the developed hillside areas are also limited in part because of single-family residential density regulations, slope density restrictions, and the topography. No change areas are proposed within the hillside portions of the CPA, the Proposed Plan poses no potential to result in further risks related to development in the hillside areas. See also **Master Response No. 9 – Hillsides** discussing how the Proposed Plan will not foreseeably result in new development in the hillsides and **Master Response No. 5 – Emergency Services**.

Finally, the commenter does not provide substantial evidence supporting that the Proposed Plan will result in a significant impact related to wildfires or that the impact conclusion in the EIR of less than significant is not supported. No mitigation measure is required.

Response 36-54

The comment states that the EIR noise analysis is general, and that hillside portions of the CPA have unique noise and vibration transmission, and atypical single-family construction techniques (e.g., pile setting); the comment provides Attachments A and F as examples. The comment requests that the EIR analyze hillside noise issues and identify hillside-specific noise mitigation measures. Similarly, the comment states that Mitigation Measures **N1**, **N2, N3**, and **N4** should apply to both discretionary projects and ministerial projects particularly in the hillsides.

Temporary increases in noise levels are assessed starting on page 4.12-24 of the EIR. The noise levels shown in Table 4.12-9 account for operation of multiple pieces of equipment at the same time, which would include hillside construction. Construction activities on the hillsides is inherently limited by the size of the project site. The size and topography of the project site typically limits the use of the largest (i.e., noisiest) pieces of heavy-duty equipment, the size of the development, and the related duration of construction activities.

Attachments A and F of the comment letter show typical urban construction equipment. The same equipment used to install retaining walls in the hills is used to install retaining walls for subterranean garages. An impact pile driver does not appear to be shown in the Attachments. Piles are typically drilled into hillsides, which generates much less noise than driven piles. According to the Federal Highway Administration Roadway Construction Noise Model, a caisson drill generates a noise level of approximately 77.4 dBA at 50 feet and a pile drive generates a noise level of approximately 94.3 dBA at 50 feet. According to the California Department of Transportation- *and Construction-Induced Vibration Guidance Manual* published in June 2004, a caisson drill generates a vibration level of approximately 81 Vdb at 50 feet and a pile drive generates a vibration level of approximately 106 Vdb at 50 feet. The caisson drill noise is similar to a bulldozer and is not an unusual source of construction noise and vibration in urban areas.

As stated in the EIR, on page 4.12-14, the characteristics of projects that could have the potential to result in significant impacts on noise-sensitive land uses within 500 feet of certain project sites with regard to construction noise are listed. Therefore, other projects that meet the following characteristics stated below could result in disturbance to residents and employees at adjacent properties but the resulting noise levels are not considered to be potentially significant physical impacts to the overall environment.

- One subterranean level or less (approximately 20,000 cubic yards of material);
- Construction durations of 18 months or less (excluding interior finishing);
- Equipment rated 300 horsepower or less, typically small and medium backhoes, bulldozers, etc. (caterpillar equipment manufacturer identifies 300 horsepower as a rough threshold between medium and large heavy-duty equipment); and
- No potential for impact pile driving.

The majority of hillside development does not meet the characteristics listed on page 4.12-14 and it is the City's determination that these projects would generally not result in significant adverse noise impacts to the environment as a whole. As acknowledged on page 4.12-20 of the EIR, a small number of projects could result in significant impacts – such significant impacts would be expected to result from use of pile driving equipment. In general, pile driving is not used by ministerial projects and in general, construction projects are reasonably anticipated to be part of the urban fabric of a major city in the United States. Projects that do not meet these requirements require detailed noise studies as stated in Mitigation Measure **N4**.

Regarding construction vibration, a detailed analysis is provided starting on page 4.2-17 of the EIR. Vibration is an unavoidable byproduct of construction activity. There is no evidence to support the need for a modified mitigation measure to protect existing hillside development from noise and vibration generated by future projects. In an urban environment, vibration from construction equipment is related to the weight and movements of equipment. In the absence of specific development projects with detailed construction requirements and known adjacent uses, it would be speculative to attempt to determine specific potential for impact and determine feasible, appropriate mitigation to control equipment weight and movements from construction activity associated with each project.

As stated on page 4.12-20 of the EIR, requiring Mitigation Measures **N1** and/or **N2** for all projects would be infeasible because the City has determined the use of staff resources to apply these mitigation measures to all ministerial projects is not justified. It would require City staff to evaluate each and every ministerial project to determine if that project, because of its unique characteristics, should be subject to this mitigation measure. Additionally, it would require rezoning every property to get authority to review ministerial projects. From an implementation and administrative point of view requiring these procedures or actions would be extremely difficult and require an inordinate amount of staff time and resources to capture the small number of projects that could have significant impacts. Requiring Mitigation Measures **N3** and **N4** for all projects would be infeasible for the same reasons, as stated on page 4.12-22 and page 4.12-26, respectively.

Please see **Master Response No. 9 – Hillsides**.

Response 36-55

The comment references the significant and unavoidable impacts of the Proposed Plan related to transportation, and states that the analysis is broad. The comment asks about the availability of tables associated with traffic analysis and states that Mitigation Measures **T1** and **T2** are qualified and therefore, ineffective. The comment also states that Figure 4.15-1 should have labels identifying street classifications and if there are any design issues associated with key roadways that may result in safety hazards or emergency access issues, and that haul routes in the hillsides should be included in the traffic analysis.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 36-56

The comment indicates that the EIR presents the existing LOS information but does not provide a table showing the existing traffic volumes, and that not all collector streets are shown on the Figure 4.15-1 (e.g., North Curson Avenue, Nichols Canyon, Willow Glen Road, Mulholland Drive, North Kings Road, and Doheny Drive). The comment states the EIR is flawed because the collectors and the hillside haul routes are not analyzed. The comment is also requesting if the passenger car equivalent (PCE) is accounted for in the LOS analysis since haul routes are located in the hillside areas and construction activity has been occurring in the hillside areas. The comment also states that more specific mitigation measures should be included to address congestion related impacts.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 36-57

This comment is regarding potential issues associated with construction and increases in traffic on red flag streets in the High Fire Severity areas of the Plan. The comment states that the EIR needs to identify existing emergency access issues and show red flag parking restriction streets and substandard streets.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743 and included updated analysis related to emergency access. No significant transportation impacts, including to emergency access, would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Please see also **Master Response No. 5 – Emergency Services**.

Response 36-58

The comment requests that substandard streets in the hillside areas be acknowledged in the EIR because the existing roadway characteristics and presence of on-street parking can result in hazards and emergency access issues. The comment requests a map that identifies the substandard streets.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743 and included updated analysis related to emergency access. No significant transportation impacts, including to emergency access, would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Please see also **Master Response No. 5 – Emergency Services** and **Master Response No. 4 – Infrastructure**.

Response 36-59

The comment states that the EIR needs to provide more information on the roadway conditions of substandard streets in the hillside areas. The comment states that due to poor conditions of these streets and infrastructure failure-related hazards resulting from increased traffic and future construction activity, there is the potential to result in hazard impacts and the EIR should address it.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743 and included updated analysis related to emergency access. No significant transportation impacts, including to emergency access, would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Please see also **Master Response No. 5 – Emergency Services** and **Master Response No. 4 – Infrastructure**.

Response 36-60

The comment states that the circulation system impact thresholds are inappropriate and that the thresholds should focus on key roadways in the Plan Area and not the volume-weighted average of the V/C ratio of system wide averages, and states that the impact analysis should inform the crafting of mitigation measures.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743.

Section 4.15 of Draft EIR on pages 4.15-29 through 4.15-31 describes the methodology used to analyze roadway segments and explains that the street segment capacity analysis is sufficient and appropriate to characterize the flow of traffic and analyze operational changes as part of a program-level analysis, such as the Proposed Plan. Please see **Master Response No. 8 – Transportation & Traffic** for additional context as to why vehicular circulation impacts can no longer be mitigated in urban areas, such as Hollywood, and how this has led to the adoption of new CEQA Guidelines in early 2019 to comply with SB 743.

Response 36-61

The comment states that the EIR should include an impact threshold for emergency access that considers if new development in the Plan Area will result in inadequate emergency access in the red flag areas or in areas that have substandard roadways.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with

SB 743 and included updated analysis related to emergency access. No significant transportation impacts, including to emergency access, which includes discussion of Fire Services provided in hillsides, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 36-62

The comment states that the EIR should consider the increased roadway hazards due to additional on-street parking demand caused by new development along substandard roadways and on red flag streets. The comment also requests that the EIR determine if existing parking code requirements for single-family homes in hillside areas are sufficient to avoid roadway hazard impacts.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743 and included updated analysis related to emergency access. No significant transportation impacts, including to emergency access, would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

See also **Master Response No. 9 – Hillside**s.

Response 36-63

The comment states that the EIR does not include a VMT impact threshold.

Since the release of the EIR, the City has updated its transportation impact thresholds for VMT. This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds that include a VMT threshold. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 36-64

The comment requests additional information on the roadway network contained in the subarea Travel Demand Forecasting model. The comment also questions the street segment capacity analysis. The comment also asks if a nexus study was conducted for the Plan Area, and if so, to make it available.

The Hollywood Community Plan Area Model Development Report contained in Appendix J of the EIR describes the roadway network in the subarea model (page 2 and Figure 2). The model contains City roadways classified as Boulevards or Avenues within the Plan Area as well as some collector roads.

As noted in the EIR (page 4.15-30), the model has a future horizon year of 2040 and was designed to produce daily and AM and PM peak hour vehicle and transit flows on roadways within the Project Area based on the proposed transportation network and comprehensive land use and socioeconomic data (SED). The model uses a conventional 4-step process of trip generation, trip distribution, modal split and assignment. The Hollywood Community Plan Area Model Development Report (Appendix J) explains how SED is reflected in the model and explains that the 2040 model contains the Transportation Project List presented in Table 4.15-7 of the EIR. The SED is associated with the traffic analysis zone system (pages 2 through 3 and Figure 1), and the future year model is based on future reasonably expected development as described in Appendix B of the EIR and shown in Table 5 of Appendix J (which includes ADUs and TOC units in the Plan Area). See **Master Response No. 2 – Housing, Population, and Employment** for more information. Outside of the Plan Area, the growth projections in the model are consistent with the SCAG 2016 RTP/SCS model which includes all reasonably foreseeable development and regional transportation improvements for the year 2040 (page 4.15-31). SCAG updates its regional model approximately every four years as part of the RTP/SCS process and the regional model serves as the best available information and forecasting tool to project regional growth. While the allowance of ADUs and TOC units mentioned by the commenter may influence the location of new housing units in the region, the overall growth projected by

SCAG is not expected to change as a result of these policies. It is common for land use policy changes to occur in between RTP/SCS updates and not reasonable to upate the regional model to reflect every change at the time that it occurs, such as the ADU and TOC policies mentioned by the commenter. SCAG accounts for these types of policy changes during the subsequent RTP/SCS updates. The transportation network and SED detail contained in the model is appropriate for the roadway segment analysis results reported in the EIR.

The Nexus Study is included in the EIR as Appendix K. The Transportation Impact Assessment (TIA) Fee Program Study for the Hollywood Community Plan Update was published for 75-day public review and comment in the EIR. The Transportation Project List presented in Table 4.15-7 of the EIR reflects the projects that would be funded through the TIA fee program (if it was adopted by the City) and were reflected in the 2040 Hollywood Community Plan Model. Please see **Master Response No. 8 – Transportation & Traffic** for additional context as to why vehicular circulation impacts can no longer be mitigated in urban areas, such as Hollywood, and how this has led to the adoption of new CEQA Guidelines in early 2019 to comply with SB 743.

Response 36-65

The comment is regarding the neighborhood traffic management plan treatments and is requesting that additional neighborhood traffic management components focused on truck size and truck trips associated with construction in the hillsides be incorporated as treatment options. The comment states there should be Neighborhood Traffic Management Plans for the Laurel Canyon, NCNA, LFIA and DSPNA neighborhoods as mitigation.

The types of traffic calming treatments contained in the Project List in Table 4.15-7 are intended to be broad to provide the City flexibility to implement the most effective traffic calming solutions for individual roadways in the Plan Area through future planning efforts. Implementation Program Number 70 in the Draft Community Plan further emphasizes the need for neighborhood traffic management treatments in response to the following Plan policy:

M1.9. Residential Neighborhoods. Continue to implement traffic calming measures in residential neighborhoods, including hillsides, which are impacted by speeding and/or commuter cut-through traffic, while improving pedestrian and bicycle circulation. This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts have been included in the discussion of emergency access resulting from increased neighborhood traffic intrusion in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4 on page 4.15-52. Otherwise, neighborhood intrusion is not a significant impact under the City's threshold of significance for transportation per LADOT's Transportation Assessment Guidelines. And therefore, mitigation for impacts related to neighborhood intrusion is not required. Please see **Master Response No. 8 – Transportation & Traffic**, as well as RDEIR Impact Section 4.15 finding no significant unavoidable impacts related to transportation.

Please also note that the commenter sought to incorporate by reference all oral and written public comments for the following projects: 8301 West Grand View Drive, ZA-2017-86-ZAD, ENV-2017-2286-CE; 8495 West Cole Crest Drive, ZA-2017-9-ZAD, ENV-2017-10-CE; 8551 West Cole Crest Drive, ZA- 2017-86-ZAD, ENV-2017-87-CE; 1800-1818 Crisler Way, ZA-2015-4125-ZAD, ZA-2015 4125- ZAD, ZA-2015-4125-ZAD, ZA-2015-4125-ZAD, ENV-2015-4131-MND; 8413 Grand View Drive, ZA-2014-2854-ZAD-ZAA, ENV-2014-2855-MND; and recent Haul Route Applications and associated hearings in the DSPNA area including for 1565 Haslam Terrace – ENV-2018-219-CE, 1395 -1397 N. Doheny Drive, 1800 N. Doheny Drive, 1868 N. Doheny Drive, 9016-9022 Hopen Pl, 1328 Devlin Dr, 11601 N Mountcrest Ave, 18673 Franklin Ave. and 18745, 18751, 18757 Hollywood Blvd. The commenter did not explain how these comments are relevant to the Hollywood Community Plan EIR and/or project to allow the City to understand what changes were being requested in the Draft EIR. Comments on these individual projects are addressed

as part of the administrative record on each of these projects. To the extent that comments and responses are applicable to this community plan they are incorporated by reference. In general, commonly applicable topics are addressed in **Master Response Nos. 1 through 9**.

Response 36-66

The comment states that the consistency analysis for Impact 4.15-1 is general and the finding of a less than significant impact is not supported. The comment states the Proposed Plan would allow for more than SCAG's projections for housing, population and employment, and asks how these plans would be consistent.

Impact 4.15-1 asks if implementation of the Proposed Plan would conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The question is not about conflict with housing, population, and employment. Therefore, this comment is a matter of opinion. As stated in the EIR, the objectives of the Proposed Plan are consistent with the 2016-2040 RTP/SCS and the Mobility Plan 2035 in that it seeks to enhance access to transit stations and creates new land use and zoning regulations to encourage appropriate mixes and scales of uses as well as site design supportive of transit use through pedestrian-friendly design standards in areas next to transit systems. As stated on page 4-15-35 of the EIR, the proposed updates to the Proposed Plan are consistent with the City's multimodal approach to transportation planning and the Plan's proposed mobility improvements would provide transportation options and accommodations for multiple modes of travel as part of the transportation system. Therefore, a less than significant impact related to consistency with other plans with respect to transit, bicycle or pedestrian policies would occur. The comment does not provide any substantial evidence as to why this impact conclusion cannot be supported.

Consistency between the Proposed Plan and SCAG's RTP/SCS is discussed in the Land Use and Planning section of the EIR. The Proposed Plan is consistent with the key goals of the RTP/SCS. See Table 4.10-2, Consistency of Proposed Plan with SCAG RTP/SCS, on pages 4.10-18 and 4.10-19 for more information.

Response 36-67

The comment states that the City's Mobility Plan 2035 includes policies to address scenic corridors, but no scenic corridor plans have been created yet. The comment states that the Community Plan does not require the preparation of a scenic corridor plan for Laurel Canyon, and therefore, the two plans are not consistent. The comment requests a mitigation measure requiring the preparation of a Laurel Canyon Parkway Specific Plan or a Laurel Canyon Scenic Corridor Plan and a moratorium on development until such a plan is in place.

The EIR concludes that implementation of the Proposed Plan would have a not have an impact on a scenic highway; see pages 4.1-31 to 4.1-32 for the discussion. Therefore, no mitigation measures are required. The Community Plan includes Policy M7.1 that supports program that encourage the identification and preservation of scenic highways as well as a new implementation program (P142) to study additional highways for scenic highway designation in accordance with Mobility Plan 2035's selection criteria. Based on this, the Proposed Plan is consistent with the Mobility Plan 2035 and the Commenter has not provided substantial evidence that would show that there is inconsistency. Additionally, as the impact is less than significant, no mitigation measure is required.

Response 36-68

The comment requests additional analysis of roadways classified as collectors in the area and more information on how the land use patterns are included in the circulation system analysis.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts of the Proposed Plan have been included in the discussion of emergency access to reflect the potential secondary impacts resulting from increased congestion and increased neighborhood traffic intrusion in the

Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4. Section 4.15 on pages 4.15-29 through 4.15-31 describes the methodology used to analyze roadway segments and explains that the street segment capacity analysis is sufficient and appropriate to characterize the flow of traffic and analyze operational changes as part of a program-level analysis, such as the Proposed Plan.

Please see **Master Response No. 8 – Transportation & Traffic** for additional context as to why vehicular congestion is no longer a significant impacts, such as Hollywood, and how this has led to the adoption of new CEQA Guidelines in early 2019 to comply with SB 743. Please see **Response 36-64** regarding the land use growth contained in the subarea model.

Response 36-69

The comment states that Mitigation Measure **T1** is problematic, and defers mitigation because it includes the wording "as resources permit." The comment expresses an opinion that the EIR does not identify a package of mitigation measures that could reduce impacts to less than significant because more specific analysis might have provided more information.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts of the Proposed Plan have been included in the discussion of emergency access to reflect the secondary impacts resulting from increased congestion in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 36-70

The comment is regarding the neighborhood intrusion impacts discussed under Impact 4.15-3 and states that the analysis is incorrect because it does not consider all collector streets and hillside roadways.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. As discussed in the EIR on page 4.15-52, the secondary neighborhood traffic intrusion impacts are assessed qualitatively because the routing of traffic to local residential streets depends on the locations of site access points for each development site that are not known at this time. The conclusion in the EIR that neighborhood traffic intrusion can be caused by traffic generated by the Proposed Plan and/or traffic diverted or shifted due to the Proposed Plan onto local streets in residential neighborhoods would not change if additional collector and hillside roadways were included in the travel demand model. Additionally, congestion alone is not a significant impact and the recirculated Section 4.15 studies emergency access.

See also **Master Response 9 – Hillsides**.

Response 36-71

The comment states that project construction traffic on a case-by-case basis has not been sufficient to avoid impacts in hillside neighborhoods (Laurel Canyon and DSNPA areas). The comment is regarding Mitigation Measure T2, and how it also contains the language "as resources permit." The comment states that both Mitigation Measure T1 and T2 should include performance measures. The comment also states that the analysis is broad and the conclusion is significant and unavoidable and the information needed to develop mitigation measures is not available.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts

have been included in the discussion of emergency access resulting from increased neighborhood traffic intrusion in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4. Please see **Master Response No. 8 – Transportation & Traffic** for additional context as to why vehicular congestion is no longer a significant impact. Please see **Responses 36-65** and **36-67** for additional information on implementation programs contained in the Proposed Plan related to neighborhood traffic management and Laurel Canyon Drive. See also **Master Response No. 9 – Hillsides**.

Response 36-72

The comment is regarding the CMP impacts discussed under Impact 4.15-4 related to the specificity of the information provided and Mitigation Measure **T3**.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. As explained on page 4.15-5, the City of Los Angeles opted out of the CMP in July 2019 upon the adoption of the City's new CEQA metrics for transportation, and on August 28, 2019 the City was notified by Metro that the provisions of the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. The statewide adoption of new CEQA Guidelines also pertains to the operations of the freeway system under Caltrans control. As stated in Comment Letter 1, Caltrans is encouraging the implementation of active transportation amenities to provide an alternative to driving knowing that identifying viable solutions to reducing congestion on State facilities is challenging and offers to work with the City to look for opportunities to develop projects that improve safety and connectivity for pedestrians and bicyclists.

Response 36-73

The comment is regarding the less than significant emergency access and traffic disruption during construction impacts in the EIR. Specifically, the comment is stating that impacts of additional development permitted under the Plan on hillside roadways and the construction activities resulting from this development will impact emergency access in hillside areas. The comment states that Mitigation Measure **T4** Traffic Control Plan is lacking in detail. The comment states that additional mitigation measures are needed to address these concerns on hillside roadways such as requiring projects to submit a Hillside Construction Staging and Parking Plan, follow additional restrictions and limitations for issues such as loading and unloading, be subject to more penalties, fund an independent Construction Monitor and Construction Monitoring Program, and repair streets surrounding the project impacted by construction activity.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. In addition to considering the primary impacts of the Proposed Plan, the potential secondary impacts of the Proposed Plan have been included in the discussion of emergency access to reflect the potential secondary impacts resulting from increased congestion in the Plan Area due to additional development and regional background growth as discussed under Impact 4.15-4. The Proposed Plan is establishing a new Hillside Construction Regulation supplemental use district to cover additonal hillside single-family residential neighborhoods on both sides of the US-101 and has a future Implementation Program 146: Consider amendments to the existing HCR to address enforcement; coordinate hauling and grading activities; and clarify public and private street improvements standards. Expand application of HCR as appropriate.

See also **Master Response 9 – Hillsides**.

Response 36-74

The comment states that the EIR needs to address the cumulative impacts of emergency access and traffic disruption resulting from hillside developments and is requesting that additional mitigation specific to the hillside areas, such as requiring a Cumulative Projects Coordination Program for each hillside neighborhood, including Laurel Canyon, NCNA, LFIA, and DSPNA, be included in the EIR.

The EIR determined that the Proposed Plan would not have a cumulative considerable contribution to a significant cumulative impact related to emergency access, please see the discussion on page 4.15-61 of the recirculated Section 4.15, Transportation and Traffic. The Proposed Plan is also establishing a new Hillside Construction Regulation supplemental use district to cover additonal hillside single-family residential neighborhoods on both sides of the US-101 and has a future implementation program 146: Consider amendments to the existing HCR to address enforcement; coordinate hauling and grading activities; and clarify public and private street improvements standards. Expand application of HCR as appropriate.

Please see **Master Response – No. 8 – Transportation & Traffic** and **Master Response 9 – Hillsides**.

Response 36-75

The comment states that the HCR needs to be updated to address construction impacts in the Hollywood Hills due to the unique characteristics of the area and is requesting that the City develop a Hollywood Hills HCR. The comment suggests limitations on the size of construction and hauling vehicles.

The Proposed Plan is establishing a new HCR supplemental use district to cover additonal hillside single-family residential neighborhoods on both sides of the US-101 and has a future Implementation Program 146: Consider amendments to the existing HCR to address enforcement; coordinate hauling and grading activities; and clarify public and private street improvements standards. Expand application of HCR as appropriate.

Response 36-76

The comment states that the EIR fails to address whether infrastructure and public services are adequate to support the levels of growth under the Proposed Plan and points to age of the existing infrastructure and the age of existing public service plans and analyses. The comment further states that the EIR needs to determine whether there is infrastructure to support that growth, or whether a nexus fee study needs to be prepared to develop an infrastructure impact fee structure for new development in the Plan Area. The comment also states that the impact analysis is deficient because it does not take account of the cumulative impact of additional population and housing growth in the CPA, and the City, resulting from recent legislation such as ADU regulations, Measure JJJ and the City's TOC Guidelines. The comment also states the residential communities in the Hollywood Hills have experienced several pipeline failures, due in part to development activity in areas with steep slopes and substandard roadways and that mitigation is necessary to reduce pipeline and infrastructure failures in hillside areas. Attachments to this comment included a summary of the status of the City's General Plan elements indicating the Infrastructure System Element is out of date and pending an update. A map (Figure 3) identifying the locations of pipeline breaks and photographs depicting failing infrastructure in the Laurel Canyon Area were also included.

Figure 3 provided by the commenter does not include the data source of the map nor the time period of when the water main breaks supposedly occurred. In recent years, LADWP has acknowledged the need to replace aging water mainlines and summarizes water mainline leakages in the City in their publications along with the linear footage of water mainlines that have been replaced each fiscal year. The latest published LADWP Water Infrastructure Plan 2018-19 states that the City's fiscal year 2017-18 leak rate of 19.6 per 100 miles is better than the national industry average of 25 leaks per 100 miles. The same report provided a graph titled Mainline Installation and Number of Leaks, which shows that the number of leaks per 100 miles have decreased significantly since fiscal year 2006/07, and there has been a constant increase in miles for the water mainline replacements every year since 2006 (from 16 miles to approximately 296 miles in fiscal year 2017-2018). LADWP's Water System Ten-Year Capital Improvement Program for the Fiscal Years 2010-2019 shows that about 36 percent of the $6.6 billion budget is dedicated to infrastructure reliability, which includes replacing or upgrading major system components, primarily distribution mains, major system connections, and reservoir improvements. The LADWP Briefing Book 2019-20 states that there is a goal to invest over $6 billion to upgrade and replace critical water infrastructure through the water system capital improvement plan over the next five years.

The comments provide no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Please see **Master Response No. 4 – Infrastructure** and Appendix B, Methodology as well as **Master Response No. 9 – Hillsides**.

Response 36-77

The comment states that the EIR needs to include mitigation measures to limit the size and weight of construction vehicles on substandard streets in hillside areas, as heavy vehicles increase the likelihood of infrastructure failure.

Many hillside communities in Hollywood are currently in or will be in a HCR district. The HCR only allows 10-wheeler dump trucks with a capacity of 10 cubic yards or smaller, and a maximum of four trucks are permitted to haul per hour per project site, and only one hauling vehicle is permitted per project site at any one time (convoys are not permitted). See Ordinance 184827 for more information.

See also **Master Response No. 9 – Hillsides**.

Responses 36-78 and 36-79

The comment states that the infrastructure-related conclusions in the EIR are generalized and are not supported by substantial evidence. The comment further states the EIR fails to address the impacts of additional demand and construction activities on aging infrastructure and the potential for an acceleration of infrastructure failure as a result of development under the Proposed Plan.

The comment states that the EIR acknowledges the potential for infrastructure impacts but fails to identify the areas of infrastructure concern and then dismisses the potential for impacts based on the City's permitting process. The comment further states that the City permitting does address whether an individual project is compatible with the infrastructure capacity, the review process does not address the capacity of the system as a whole or the potential of development to accelerate infrastructure failures in parts of the system not immediately adjacent to such development projects. The comment also indicates that the timing of such reviews is too late in the development process to avoid potential impacts. In addition, the comment states the EIR ignores the infrastructure crisis facing the LADWP, citing LADWP's 2017-2018 Water-Infrastructure Plan, the Navigant Consulting, Inc. study for LADWP titled "Review of LADWP's 2015 Power and Water Rate Increase Proposal." The comment also takes issue with the EIR stating that future MNDs and CEs would be prepared for individual infrastructure replacement projects, rather than addressing the need created by the Proposed Plan and cumulative development, stating that this is a case of improper piecemealing. The comment takes issue with the EIR's statement that impacts would be less than significant and states that the EIR needs to include mitigation, such as the creation of an impact fee, or trust account to be used to repair infrastructure damaged by the construction projects in the HCP Area.

Please see **Response 36-76** regarding water infrastructure and **Master Response No. 4 – Infrastructure.** The comments do not raise issues or provide substantial evidence supporting a need to change the Draft EIR conclusion or analysis. The impact conclusions are less than significant and do not require mitigation. See also **Master Response No. 9 – Hillsides**.

Response 36-80

The comment states LADWP's 2015 Urban Water Management Plan does not account for the increased residential density that will occur in the Plan Area and Citywide as a result of increasing housing production such as Accessory Dwelling Unit legislation, Measure JJJ and the City's TOC Guidelines. The comment states Table 4.16-3 presents the LADWP's water supply in acre-feet per year for residential, commercial, industrial and public facilities uses but should include all possible water uses, including agricultural and should provide information for the Plan Area and the LADWP area as a whole. The comment states Table 4.16-6 presents existing water demand in terms of million gallons per day and asks how can readers of the EIR compare water supply and demand if they are presented in different units. The comment also suggests

that Table 4.16-6 should provide information for both the Plan Area and the LADWP area as a whole. The comment states that the EIR makes conclusionary statements on page 4.16-16 but the projected water supply and demand figures for the Plan Area and LADWP areas are not presented in a way that would allow the reader to determine if the statement is accurate and CEQA requires disclosure from evidence to conclusions. The comment states that the discussion of water resources and utilities as a whole fail to comply with this CEQA requirement.

Please see **Master Response No. 4 – Infrastructure**. In regards to the comment, about the use of different units, one million gallons per day (mgd) is equivalent to 1,120 acre feet per year. The comments do not raise issues or provide substantial evidence supporting a need to change the EIR conclusion or analysis.

Response 36-81

The comment points to a letter from the Wastewater Engineering Services Division in Appendix I of the EIR that states if "the public sewer has insufficient capacity for any proposed building project then the developer will be required to build public sewers to a point in the sewer system with sufficient capacity." The comment further states that this should be included as a mitigation measure, but that this requirement does not address how sewer facilities in poor condition or in need of emergency repair will be addressed or address the impact of construction activity in proximity to sewer facilities in need of repair. Lastly, the comment states that the EIR analysis is too general and the conclusions are not supported by substantial evidence. The comment states that the EIR needs to include a finer-grained analysis so that appropriate mitigation can be crafted.

Please see **Master Response No. 4 – Infrastructure**. See also **Master Response No. 9 - Hillsides**. The comments provide no substantial evidence supporting the need for different analysis or conclusions from those in the EIR.

Response 36-82

The comment provides a conclusion to the comment letter stating that the EIR should be revised to more accurately identify significant impacts in the Hollywood Hills and Los Feliz neighborhoods that would result from development under the Proposed Plan and requests additional mitigation measures. The comment also states that the EIR should be recirculated for additional review based on the disclosure of additional or more severe significant impacts.

Please see all preceding responses.

LETTER NO. 37

Jamie T. Hall, President
Laurel Canyon Association

Response 37-1

The comment states that the comment letter provides suggestions for mitigation measures that are based on observations of the environmental impacts that three neighborhood associations have witnessed during the development in the hills of the CPA.

The responses below address specific comments on the Proposed Plan and the environmental analysis in the EIR.

Response 37-2

The comment provides an overall summary of the comments of the Laurel Canyon Association, Doheny Sunset Plaza Neighborhood Association, and Nichols Canyon Neighborhood Association, including the general concern that the Proposed Plan and EIR do not pay adequate attention to the hillside areas of the CPA. The comment states that the hillsides are a natural resource for the community and are being degraded by development. The comment also states that hillside communities should be protected accordingly, citing emergency vehicle access, as well as visual and noise related concerns that warrant special attention.

Since the comment is an introductory summary that does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR no further response is required. Please refer to **Responses 37-3** through **37-25** for responses on specific concerns.

Response 37-3

The comment outlines observations about hillside vacant homes as investment properties and requests a policy be added to support long-term home habitation.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-4

The comment discusses general ecological and aesthetic benefits associated with open space, and recommends that preservation of biological resources, aesthetics, and open space in the hillsides should be fundamental guiding principles in the Proposed Plan.

The Proposed Plan has primary objectives as stated on page 3-13 of the Project Description. One of them is to accommodate growth consistent with the growth strategies of the Framework Element; one of the growth strategies is to focus growth into Framework identified Centers and corridors while preserving single-family neighborhoods, hillsides, and open space. More than 300 acres of land in the hillsides are being changed to Open Space to reflect open space uses or conservation. One of the guiding principles of the Community Plan is to safeguard hillside areas; see page 3-3 of the Community Plan in the Final EIR Updated **Appendix D**. The Community Plan has goals, policies, and implementation programs in Chapter 4: Public Realm, Parks, and Open Space that support the protection of existing natural areas and wildlife habitat.

The EIR addresses the Proposed Plan's impact on scenic vistas and scenic resources (including views to and from Santa Monica Mountains, and Santa Monica Mountains as a scenic resource), biological resources (including whether the Proposed Plan would impact wildlife in the Santa Monica Mountains), and open space and recreational facilities (including those in the Santa Monica Mountains). As discussed on pages 4.1-28 to 4.1-40 of the EIR, the Proposed Plan would have a less-than-significant impact on scenic vistas and visual character of scenic resources. Existing biological resources, such as wildlife habitats, SEAS (sensitive ecological areas), and movement and migration of wildlife species, HCPs, and Heritage Trees and Ordinance Protected Trees were discussed starting on page 4.4-7 to 4.4-14 in Section 4.4 – Biological Resources. The Proposed Plan would have a significant and unavoidable impact on biological resources and parks and recreational facilities. The EIR contains Mitigation Measures **BR-1** through **BR-6** which would protect sensitive biological resources within the Santa Monica Mountains. The Proposed Plan does not propose land use designation or zone changes in the Santa Monica Mountains, except for consistency corrections that would reflect existing uses, such as open space conservation. The General Plan Land Use Map footnote (Administrative Note No. 3) supports the redesignation of vacant land for the purpose of conservation to Open Space as appropriate:The Open Space (OS) land use designation is premised on the ownership and use of the property by a government agency, nonprofit or conservation land trust for the primary purposes of public recreation use or open space conservation. The designation of the Open Space (OS) zone as a

corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency, nonprofit or conservation land trust officially determines that vacant land under their ownership is to be used as open space, the property may be redesignated and/or rezoned to Open Space.

Hillside areas with Open Space land use designations would be retained by the Proposed Plan. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR.

Response 37-5

The comment states that the infrastructure in the hills is failing. The comment states that many roads are crumbling and have not been fixed in decades; the water and sewer pipes are among the oldest in the city; and the electrical grid has been neglected for many years and has yet to be upgraded. The comment states that this is a disaster waiting to happen and that upgrading hillside infrastructure must be a priority made explicit in the Proposed Plan.

Please see **Master Response No. 4 – Infrastructure** and also **Master Response No. 9 - Hillsides**.

Responses 37-6 and 37-7

The comment requests limiting the size of new houses built in the hillsides to discourage out-of-scale development and suggests that the size could be determined in relation to nearby development. The comment discusses zoning variances in the hillsides, and suggests that development on private streets should follow zoning rules or be required to seek a Zoning Administrator's Determination.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The EIR concludes a less than significant impact on whether the implementation of the Proposed Plan would substantially degrade the existing visual character or quality of the site and its surroundings; see pages 4.1-32 to 4.1-40 of the EIR for the discussion. No mitigation measures are required. Ordinance 184802, adopted in 2017, limits the maximum Residential Floor Area in the hillsides relative to the specific single-family hillside zone and the specific associated slope band. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-8

This comment states that there are substandard lots in the Hollywood Hills that are undeveloped without access to infrastructure, and that potentially significant environmental effects would accrue if the lots are allowed to be developed. The comment suggests that a lot merger ordinance be adopted.

Development of single-family dwellings, accessory buildings and additions in the hillside is subject to LAMC Section 12.21.A.17, which has regulations for setbacks, height, fire protection, street access, lot coverage, sewer connection, and parking. These adopted regulations are under the Baseline Hillside Ordinance 181624. In addition, Ordinance 184802, adopted in 2017, limits the maximum Residential Floor Area in the hillsides relative to the specific single-family hillside zone and the specific associated slope band. The comment makes a vague reference to environmental effects but does not provide enough details for a response. Additionally, the Proposed Plan is not anticipated to result in new development in the hillsides from any proposed land use or zone changes. Please see **Master Response No. 9 – Hillsides**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-9

The comment states that LAMC Section 12.21.C.8 regulates retaining walls in the hillside areas. The comment suggests amendments to Ordinance No. 176,445(retaining walls) to strengthen provisions.

The comment is a policy suggestion. Please refer to **Master Response No. 1 – General Comments and Non-CEQA Issues**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-10

The comment states that the Proposed Plan should identify specific open space resources including privately held land in an effort to protect existing open space within the CPA. The comment also states that the Proposed Plan should include policies directed toward preserving open space that is privately held rather than allowing further development on such lands. The comment also identifies the environmental benefits of open space (i.e., carbon sequestration, aquifer recharge, etc.) stating these benefits would be lost without open space preservation.

The comment is a policy suggestion. Please refer to **Master Response No. 1 – General Comments and Non-CEQA Issues**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-11

The comment suggests the City create an open space department with full-time staff to coordinate the acquisition of open space.

The suggestion would not substantially reduce identified significant impacts in the Section 4.4, Biological Resources, of the EIR. See pages 4.4-16 to 4.4-28 for the discussion and impact conclusions. In addition, creation of a new City Department is a full work program that requires authorization and initiation from the City Council that would generally require city staffing and CEQA review, a public participation process, and coordination. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Please refer to **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**.

Response 37-12

The comment suggests additional approaches for open space preservation of undeveloped properties in the hillsides, including adding Q conditions on these properties to promote better development in harmony with open space and a site plan review requirement. The comment suggests that mitigation banking is a possible tool. The comment also expresses the opinion that the City should not sell City owned parcels in the hillsides, and requests that parcels owned by the SMMC or Mountains Recreation and Conservation Authority (MRCA) be designated as open space.

The suggestions would not substantially reduce identified significant impacts in Section 4.4, Biological Resources, of the EIR. See pages 4.4-16 to 4.4-28 for the discussion and impact conclusions. Several large parcels of owned by the SMMC or MRCA have been re-designated as open space. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Please refer to **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**.

Response 37-13

The comment suggests that individual discretionary projects analyze the environmental impact of all habitat loss, regardless of protection of specific species. The comment additionally requests an amendment to the protected tree ordinance.

Please refer to **Response 12-7**. The City's protected tree ordinance was recently updated with new regulations in 2021 and added the Mexican Elderberry and the Toyon as protected shrubs. For more information, see Ordinance No. 186873.

The comment does not specifically raise any environmental issue with the EIR that supports the need for new analysis or conclusion. The comment will be forwarded to the decisionmaker for their consideration prior to project approval. Please refer to **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**.

Response 37-14

The comment suggests that the Plan include additional regulations to protect wildlife corridors, including wildlife-friendly fencing and easements, and that the Plan analyze the impacts that fencing, outdoor lighting, and brush clearance requirement that are associated with new resdiential development would have on wildlife corridors. The comment also states that new development located on mapped wildlife corridors should not be eligible for CEQA exemptions.

Program 122 supports the citywide Wildlife Pilot Study to create development regulations for conserving biological resources in identified areas throughout the City, including the Hollywood CPA, in order to support habitat and movement for wildlife. At the time of the publication of the Final EIR for the Hollywood Community Plan Update in 2021, DCP is currently in the process of creating wildlife protection areas and regulations in the eastern area of the Santa Monica Mountains. Please see **Master Response No. 7 – Biological Resources** for more information about this work program.

The comment does not specifically raise any environmental issue with the EIR that supports the need for new analysis or conclusion. The comment will be forwarded to the decision-maker for their consideration prior to project approval. Please refer to **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**.

Response 37-15

This comment suggests that the Plan Update address brush clearance, and should include outreach about brush clearance specific to the Hollywood Hills, including guidance on how to clear brush with the least impact to wildlife habitat.

The Los Angeles Fire Department conducts brush clearance outreach and implements regulations; the Fire Department also has enforcement authority. See the LAFD inspection portal and video training on brush clearance online at https://vms3.lafd.org/. New brush clearance requirements were increased for fire safety in the Very High Fire Hazard Severity Zones, adopted in October 2018 in Ordinance 185789 (see Council File 09-1977-S2). Or, go online to visit https://www.lafd.org/fire-prevention/brush/brush-clearance-requirements. The Brush Clearance Unit can be reached by phone at (800) 994-4444 and its website is www.lafd.org/brush. Due to existing and recently enhanced brush clearance regulations, the request to address brush clearance as a mitigation measure is not necessary. Please also see **Master Response No. 5 – Emergency Services**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-16

The comment provides a background of Nichols Canyon Stream and identifies some of the wildlife found along the stream. The comment states that in the last three to five years, more aggressive development has been occurring stream-side and at neighboring properties, and the over-sized homes dramatically threaten the native flora and fauna, as well as the lifestyle of the residents of Nichols Canyon. The comment states that wildlife and habitat, as well as quality of life, can be protected if native trees are protected.

Please see **Master Response No. 7 – Biological Resources**. All individual projects would be required to comply with the City's Tree Preservation Ordinance. Otherwise, the comment does not provide substantial evidence to support the need for new or additional analysis or conclusion in the EIR. The comment will be provided to the decision-maker for its consideration prior to project approval.

Response 37-17

The comment states that a number of collector and smaller streets are bearing heaving traffic, and the proposed policy for collector streets does not include specific language discouraging cut through traffic.

Please refer to **Response 12-9**.

Response 37-18

This comment suggests the City re-incorporate streets withdrawn from public use.

A citywide motion was introduced (Council File No 17-1143) in October 2017, requesting the Department of Public Works to prepare a report on the current procedures for processing street reinstatement requests, the standards used to determine whether a street can be reinstated, and the resources necessary to conduct a comprehensive assessment of all remaining streets withdrawn from public use. As a result of this report City Council acted in February 2019 (Ordinance 186020) to repeal eleven previous actions from 1936 to 1970 to withdraw streets (Ordinances Nos: 76896, 77302, 78193, 87022, 93631, 107271, 108896, 110625, 125282, 132411, and 140292). Additional street incorporation would be a full work program that requires authorization and initiation from the City Council as to provide funding for a plan update that would generally require Public Works staffing and CEQA review, a public participation process, and coordination. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-19

The comment states that construction of paper streets is an environmental impact and that the city should reclassify paper streets as vacated streets or a trail network.

Policy LU2.4 encourages exploration of connecting secondary access networks when considering an application for hillside subdivisions, as well as extensions, completions, and connections of existing street networks. Hillside subdivisions are subject to the review procedures outlined in Los Angeles Municipal Code Section 17.00. A paper street is a street that has been impassable for vehicular travel for a period of five consecutive years and for which no public money was expended for maintenance during that period (Ref. Section 8331 California Code, Streets and Highways Code). A new policy (Policy PR3.4) has been added to address future rezoning of paper streets for open space easements, along with Implementation Program P136 to identify and map paper streets in the hillsides.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-20

The comment suggests a fee on new construction in the hillsides to fund infrastructure improvements.

Please refer to **Response 12-10**.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-21

The comment suggests an update to the Hillside Construction Regulation (HCR) Ordinance and suggests that all of the Hollywood Hillside Community Plan Area be included in a HCR.

Additional hillside communities on both sides of the US-101 are being added to a new HCR district in Hollywood and Program 146 in the Community Plan would consider future amendments to the HCR, including enforcement and hauling and grading activities.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-22

The comment states that construction activities in the hillsides present challenges for emergency vehicles attempting to access the hillside ares in the event of an emergency. The comment calls for limitations to be placed on construction permits issued in the hillside areas to limit the potential for safety issues. The comment also calls for the designation of hazard areas that place additional condtions on developments in hillside areas to ensure emergency vehicle ingress and egress.

Since March 17, 2017, the City has limited earth import and export activities in designated Hillside Areas to the hours between 9:00 a.m. and 3:00 p.m. Monday through Friday per Ordinance 184802; see LAMC Section 12.21 C.10.(f)(2). See **Master Response No. 9 – Hillsides** and **Master Response No. 5 – Emergency Services**.

Response 37-23

This comment suggests that the Hollywood Community Plan should advocate for funding of an Office of Hillside Construction Coordination.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-24

The comment states that there should be a maximum vehicle size limitation on substandard streets because large trucks damage roads and private property.

Ordinance No. 184,827 known as the HCR, restricts truck sizes for hauling operations within the HCR Supplemental Use District which has been established in parts of the hillside portions of the CPA. Only 10-wheel dump trucks or smaller are allowed. The Proposed Project is establishing a new HCR district in the Hollywood hillsides, which will also be subject to the same truck size restrictions.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 37-25

The comment states that sounds in the hills can impact a greater number of neighbors than the same sound in the flats and requests a hillside-specific noise ordinance in the Proposed Plan.

See **Response 12-15** for a discussion of hillside noise. See **Response 27-8** for a discussion of hillside noise echo.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 38

Adrian Scott Fine, Director of Advocacy
Los Angeles Conservancy
523 West Sixth Street, Suite 826
Los Angeles, CA 90014

Response 38-1

The comment includes introductory text and states that the Los Angeles Conservancy's comments are intended to help strengthen the Hollywood Community Plan and to ensure a long-term planning process that promotes and plans for the heritage of Hollywood. The comment states that the comment letter reiterates some previous comments and suggestions that were not addressed in the EIR.

The comment is an introductory summary that does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR, and no further response is required. Please refer to **Responses 38-3** through **38-7** for responses on specific comments.

Response 38-2

This comment states that the Conservancy previously commented in 2011 on the EIR for the prior update to the Hollywood Community Plan. The comment states that the Conservancy's goal is to ensure that there are adequate long-term protections in place and that the Hollywood Community Plan can help mitigate adverse impacts while developing meaningful tools and incentives to shape future growth in Hollywood. The commenter states that although the Plan Update attempts to foster sensitive growth while respecting and protecting historic properties and neighborhood character, more can be improved. The comment further summarizes the types of historic resources that are found in the CPA and states that the CPA has one of the highest concentrations of designated historic resources in the city.

The comment expresses opinions about the Plan's goals and makes a statement about information regarding historical resources in the Plan Area. Since the comment is an introductory summary that does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR no further response is required. Please refer to **Responses 38-3** through **38-7**.

Response 38-3

The comment states that the Cultural Resources section of the EIR has some inconsistencies and errors in how historic resources are depicted and suggests that the maps and charts be reviewed by the Office of Historic Resources for greater accuracy. The comment further recommends additional overlay mapping of historic resources and proposed zone changes and FAR incentive areas under the Proposed Plan, which could then inform the development of preservation planning tools and specific mitigation measures.

Figures 4.5-1A through 4.5-1I, which includes a series of maps, in Section 4.5, Cultural Resources, of the EIR identify the locations of the designated and eligible historical resources in the Project Area as well as the boundaries for the Proposed Subareas (Plan Change Areas). As stated on page 4.5-26, "Figures 4.5-1A through 4.5-11 are subject to change over time and should not be considered the single definitive list of historical resources in the Hollywood CPA. For up-to-date information on historical resources within the Plan Area, contact the Office of Historic Resources, DCP at http://preservation.lacity.org/ or (213) 978-1200." The commenter's suggestions would not reduce the significant and unavoidable impact conclusion to less than significant. The EIR may not include all resources, but any such deficiencies would

not affect the conclusions of the EIR. The EIR appropriately provides adequate analysis of impacts to cultural resources which does not require identification and mapping of every resource. The identification of resources in the EIR is sufficient to characterize the CPA as being rich in resources. Please also see **Master Response No. 3 – Historic Resources** for additional information on the Proposed Plan's preservation policies, discussion of the EIR analysis for cultural resources, and information about the Hollywood CPIO, which includes a proposed transfer of development rights (TDR) program and review procedures for projects involving historical resources. See the Hollywood CPIO (Final EIR Updated **Appendix E)** for more details.

Response 38-4

The comment states that the EIR does not provide enough detail about the potential for development projects and development incentives to result in impacts on historic resources. The EIR discloses that development that would occur over the life of the Proposed Plan has the potential to occur on, or adjacent to, historical resources. This is particularly true for the Change Areas where land use and/or zone changes are proposed, which could result in pressure to remove historical resources. As noted in the EIR, development can impact historical resources either through direct effects (demolition or alteration of a historical resource's physical characteristics that convey its historical significance, such as incompatible façade changes) or through indirect effects to the area surrounding a resource (such as creating a visually incompatible structure adjacent to a historical structure). The Hollywood CPIO District includes development standards for future projects to maintain design compatibility with the Hollywood Boulevard Commercial and Entertainment District and six designated and eligible historic residential neighborhoods and has review procedures for projects that involve historic resources for the purpose of historic preservation. The EIR did not identify feasible mitigation measures to reduce impacts to historic resources and disclosed that the Proposed Plan would have a significant and unavoidable impact on historic resources. Please see **Master Response No. 3 – Historic Resources**.

Response 38-5

The comment states that the proposed increases in FAR and height on parcels located within or adjacent to national or local historic districts should be evaluated for direct and cumulative impacts. The comment also requests a map be prepared as stated in **Response 38-3**. The comment expresses concern that Hollywood has been impacted by development pressure in recent years, resources have been lost, and the Plan needs to balance carefully-planned growth and preservation.

The commenter's suggestions would not reduce the significant and unavoidable impact conclusion to less than significant. The cumulative impact with respect to historical resources is discussed on page 4.5-57 of the EIR, which states that a significant cumulative impact would result under the Proposed Plan. The EIR evaluated the impact of the Proposed Plan on historical resources and disclosed that the impact would be significant and unavoidable. The commenter argues that the EIR should analyze impacts to individual resources. This is a Plan level analysis and the level of detail provided is commensurate with this type of project. The City identified the listed resources and the resources found eligible for listing in multiple maps (See Figures 4.5-1A to I and 4.5-2A to C) and lists (see Table 4.5-2). The EIR disclosed that it was more likely for resources to be impacted near Change Areas (Draft EIR page 4.5-46) and the EIR disclosed the Change Areas (Figures 3-6A to G). The EIR concluded that while it is very uncommon to lose historical resources, over a twenty-year plan, it is possible and found significant and unavoidable impacts. (Draft EIR at page 4.5-48.) Additional level of analysis related to the historical resources in the Plan Area, which number in the hundreds, would take a substantial amount of resources for the City's consultant, and City staff and would not provide meaningful information to the EIR, beyond the impact conclusion already provided. See CEQA Guidelines Section 15146 (degree of specificity corresponds to the degree of specificity in the underlying activity; plan EIRs need not be as detailed). Please also see **Master Response No. 3 – Historic Resources.** The commenter does not provide substantial evidence that shows the City failed to disclose any significant impacts.

Response 38-6

The comment states that the EIR should include mitigation measures to minimize impacts on historic resources. The comment also suggests three mitigation measures or other programs, including a transfer of development right (TDR) program, provisions to deny demolition permits until issuance of a building permit for replacement projects, and incentive programs for studios to encourage employee housing in historic bungalow courts or similar housing options.

See **Master Response No. 3 – Historic Resources** and the Hollywood CPIO (Final EIR Updated **Appendix E**), which includes a TDR program, project review procedures, and development standards for the purpose of historic preservation. The City finds that the specific mitigation measures of denying demolition permits until a building permit for a replacement project is issued and a specific incentive program for the conversion of historic bungalows courts or similar housing options are infeasible and undesirable. The City's Demolition Ordinance is already in place and currently requires notification for any demolition permit of a structure older than 45 years of age, and notification is required at least 30 days before the issuance of a demolition permit. The City's Cultural Heritage Ordinance requires that all projects that include a designated Historic Cultural Monument or discretionary projects that include eligible historical resources be subject to the Office of Historic Resources review, and projects located within a HPOZ are also subject to review. The City finds that including any additional processes, including additional delay for demolition permits or to the review and approval of projects for the purposes of historical resources protections is not feasible as it would not result in an efficient use of City resources. Further delays to the issuance of demolition permits and incentives to use historic bungalow courts for employee housing would not reduce the impacts on historical resources to a less than significant level.

Response 38-7

The comment requests that the CPIO include historic preservation review and design standards for all eligible historic resources within the CPIO boundaries.

The CPIO also includes development standards that regulate the massing, site design, and composition of new construction within the CPIO boundaries. Within the Regional Center and Character Residential CPIO subareas, development standards have been crafted to ensure new construction is compatible with existing historical resources. The CPIO also includes a clear review procedure for projects involving designated and many eligible historical resources. Eligible Historic Resources in the CPIO are properties identified as eligible for listing as individual historic resources on the National Register, or on the California Register, or as contributors within a historic district that is eligible for listing at the local, state, or federal designation program through SurveyLA (the Los Angeles Historic Resources Survey), the January 2020 Historic Resources Survey Report prepared by the CRA-LA Designated Local Authority, or any subsequent historic resource survey completed by a person meeting the Secretary of the Interior's Professional Qualification Standards for Historic Preservation and accepted as complete by the Director, in consultation with the Office of Historic resources. This term does not include a non-contributor to an eligible or designated historic district. The CPIO's definition of eligible resources does not include properties that have the 5S3 California Historical Resource Status Code, which are sites that appear to be individually eligible for local listing or designation through survey evaluation. Including sites with the 5S3 status code to the CPIO's definition of eligible resources and adding more design standards for eligible resources as a mitigation measure would not be an efficient use of City resources, and would unnecessarily add additional burdens on desirable development, including because the City already has a process for the City to initiate a designation process which prevents demolition, and would not reduce the Proposed Plan's impacts on historical resources to a less than significant level.

Please also see **Master Response No. 3 – Historic Resources** for discussion of the CPIO's historic review protections.

Response 38-8

The comment provides a summary of the letter's overall comments.

Please see **Responses 38-2** through **38-7**.

LETTER NO. 39

Susan Hunter
Los Angeles Tenants Union
Hollywood Local
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Response 39-1

The comment requests that the EIR and Plan be rewritten to address the following issues: preserve RSO units; compliance with AB 1505 for affordable housing requirements; the Plan's preference for hotels over housing; failure to look at other housing alternatives outside of rental and ownership such as social housing, co-op, or tenant eminent domain; use of the incorrect date for assessing housing needs; and quantify impacts of displacement and gentrification on tenants. The comment also says the Plan cannot conflict with California Government Code 1954.50 – 1954.535, suggests that the City get creative when implementing that section of the Code, and states that the Plan should address vacant properties and land speculation.

Under the Proposed Plan, hotels are not eligible for development incentives and are further regulated through the Hollywood CPIO. The CPIO prohibits hotel development in the Multi-family Residential subareas and requires a Conditional Use Permit for hotels in the Regional Center subareas that would remove any existing residential units. Please see the Hollywood CPIO document for more information. Please also see **Master Response No. 6 – Displacement and Affordable Housing**. AB 1505 restored the authority of local governments to apply inclusionary housing policies to rental housing. It does not mandate inclusionary zoning or require affordable housing. The comments regarding the California Government Code 1954.50 – 1954.535 (Residential Rent Control) and how the City implements the Code, housing alternatives, and Plan policies regarding vacant properties and land speculation do not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. Additional requirements for affordable housing or RSO units, and other housing alternatives would not reduce any of the significant and unavoidable impacts to a less than significant level.

The comment does not provide any substantial evidence to support its claims that the EIR failed to adequately analyze gentrification or displacement or the claim that the City used wrong date for housing needs of the area. As such, no further response is necessary.

Response 39-2

The comment states that the proposed zoning could lead to the demolition of existing RSO structures, which would conflict with the Plan's goal to protect RSO units. The comment states that this conflict is not quantified or analyzed in the EIR.

Goal LU5 of the Community Plan states: Multi-family residential neighborhoods that provide a range of housing opportunities at a variety of price points including affordable housing, through a mix of ownership and rental units. Policy LU5.13 is to preserve rent stabilized units; see the Final EIR Updated **Appendix D** for more information. The comment does not raise any new significant environmental issue, and the commenter does not provide substantial evidence otherwise. Impact 4.13-2 on pages 4.13-18 and 4.13-19 concluded a less than significant impact as to whether the implementation of the Proposed Plan would displace substantial numbers of existing housing thus necessitating the construction of replacement housing elsewhere. Please also see **Master Response No. 6 - Displacement and Affordable Housing**.

Response 39-3

The comment states that the Plan does not comply with the CRA Hollywood Redevelopment Plan's affordable housing requirement, and the EIR does not analyze the impact. The comment also states concern that the Plan does not have affordable housing requirements or RSO unit requirements prior to the approval of demolition permits.

The Proposed Plan includes an ordinance to amend the Hollywood Redevelopment Plan in order to clarify its relationship to the Hollywood Community Plan and its implementing provisions and ordinances. The Proposed Plan and its implementing ordinances provide a complete vision and regulatory approach for the land uses and development in the CPA. As such, the Hollywood Redevelopment Plan regulations are in conflict as the Proposed Plan is intended to cover the entire field of regulation for land uses and zoning standards in the CPA and because the Hollywood Redevelopment Plan regulations, (1) prohibit what is allowed under the Hollywood Community Plan and its implementing Zoning Actions; or (2) allow what is prohibited under the Hollywood Community Plan or its implementing Zoning Actions; or (3) add undesirable additional regulations, processes, costs, and burdens on the City, property owners, and developers that impede or prevent beneficial and urgently needed housing and other desirable uses in the Project Area.

Please see **Chapter 4.0, Corrections and Additions** for more information about the ordinance to amend the Hollywood Redevelopment Plan.

The EIR analyzed the build out of the Proposed Plan, which does not include a continuation of Redevelopment Plan policies, except as they have been specifically incorporated into the Proposed Plan. As stated on pages 4.10-22 through 4.10-24 of the EIR, impacts related to a project's conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project are limited to plans, policies, or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. As noted in EIR Appendix M, Inventory of Mitigation Measures, the Hollywood Redevelopment Plan's affordable housing regulation was not a mitigation measure that was adopted to reduce an environmental effect. Please see pages 4.10-22 through 4.10-24 of the EIR for analysis of the Project and the Hollywood Redevelopment Plan. The EIR analyzed the environmental impacts of the reasonably foreseeable development of the Proposed Plan, including development in the CRA Redevelopment Plan area, without CRA limitation. The City does not find that the limitation of any of the conflicting Redevelopment Plan land use policies or requirements, would result in a new or different impact from those already analyzed in the EIR. Based on this, there is no basis to find any new or different significant impact under this threshold based on a conflict with the Redevelopment Plan.

The comment on affordable housing requirements and RSO unit requirements for demolition permits does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. Additional requirements for affordable housing or RSO units would not reduce any of the significant and unavoidable impacts to a less than significant level. The Proposed Plan incentivizes affordable housing through the Hollywood CPIO (see Final EIR Updated **Appendix E**); by providing various levels of affordable housing, applicants can seek additional development rights. See also **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 6 – Displacement and Affordable Housing**.

Response 39-4

The comment states to not favor hotels over housing and not up-zone commercial uses.

Under the Proposed Plan, hotels are not eligible for development incentives and are further regulated through the Hollywood CPIO. The CPIO prohibits hotel development in the Multi-family Residential subareas and requires a Conditional Use Permit for hotels in the Regional Center subareas that would remove any existing residential units. Please see the Hollywood CPIO document for more information. Commercial areas would receive additional development incentives when providing affordable housing on site through the CPIO.

Certain commercial areas would receive incentives when providing on site publicly accessible open space. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Response 39-5

The comment states that the Plan should ban conversions or the loss of RSO units through stricter interpretation of the Ellis Act, and states that the Plan and EIR should analyze other housing options such as co-ops and social housing.

This comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Additional regulations for RSO units and more housing options would not reduce any of the significant and unavoidable impacts to a less than significant level. Housing policies in the Community Plan support the preservation of rent stabilized units and opportunities for cohousing (see Policies LU5.10, LU5.13 and LU5.17 under Goal LU5 in the Final EIR Updated **Appendix D**, Draft Community Plan); see also **Master Response No. 6 - Displacement and Affordable Housing**.

Response 39-6

The comment states that the EIR relies upon flawed and inaccurate housing data for Hollywood, and states that data provided by the Hollywood Chamber of Commerce shows a different number of housing units between 2010 and 2016 than does the Proposed Plan. The comment states that the Chamber of Commerce shows additional housing production numbers for multi-family residential through 2018, and it can be expected that other types of units built, such as small lot subdivisions and accessory dwelling units, further increase the total. The comment states that the EIR does not account for construction of new units from 2010 to 2019, and does not account for projects under construction or approved with entitlements. The comment states that Alternative 1 should be the focus of the Plan Update because the projected housing needs for 2040 have already been met.

CEQA requires comparing the baseline existing conditions to the conditions after the implementation of the Proposed Plan. The baseline existing conditions was 2016, when the NOP was published. Several data sources indicate a baseline of approximately 104,000 units; see Table 1 in Appendix B, Methodology. The EIR adequately analyzes the units reasonably expected from 2016 to 2040. Please refer to **Master Response No. 2 – Population, Housing, and Employment**. Alternative 1 is the continuation of the Existing Plan (No Project Alternative), without adoption of the Proposed Plan.

Response 39-7

The comment expresses concern about displacement of low-income earners. The comment states that the Proposed Plan intends to create an area accessible only for high-income earners and does not acknowledge if any other income level of renters will be displaced through gentrification. The comment also states that the finding does not examine the blight that is induced by a high vacancy rate. The comment does not provide substantial evidence to support that the Proposed Plan will result in blight or displacement, or environmental impacts as a result of displacement.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 6 – Displacement and Affordable Housing**.

LETTER NO. 40

Carol Massie, Owner/Operator Hollywood
McDonald's
1413 North Vine Street
Hollywood, CA 90028

Response 40-1

The comment includes introductory text and expresses the commenter's support for a Hollywood Community Plan update and increasing density around transit systems and corridors. The commenter states that the Proposed Plan's goals to promote land use policies to increase density and add to the supply of housing are important.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 -- General Comments**.

LETTER NO. 41

Richard Howard, Executive Vice President & Chief Operating Officer
Occidental Entertainment Group Holdings, Inc.
1149 North McCadden Place
Hollywood, CA 90038

Responses 41-1 to 41-6

The comment introduces the Occidental Entertainment Business Trust II and states the HCPU does not adequately take into account the emergence of modern entertainment media demands and uses. The comment requests additional development potential in terms of proposed FAR and uses permitted for the properties owned, and more FAR for Subarea 16 without use restrictions. The comment requests additional FAR for Subareas 17:1, 40, and 40:1, and to permit 100 percent residential development, including artist-in-residence, live-work conversion, multi-family residential developments, and hotels. The comment also requests a boundary expansion for Subareas 17:1 and 40:1. The comment provides closing statements to reconsider the proposed zoning and land use designations affecting the trust and attaches an Exhibit that lists 22 property addresses that should have increased FAR to 4.5:1 and additional allowed uses.

One of the Proposed Plan's primary objectives as stated in Chapter 3.0, Project Description, on page 3-14 is to provide a range of employment opportunities and to promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry. Policy LU10.3 in the Community Plan calls for preserving industrial and media uses, and to protect the Media District from encroachment by residential uses. The Plan Update incentivizes multi-family residential development in selected areas near the Media District with the provision of affordable housing. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. See also **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 42

Tom Davila, President
Outpost ONA
7007 Macapa Drive
Los Angeles, CA 90068

Response 42-1

The comment includes introductory text about the Outpost Neighborhood Association and expresses its hope that the City will adopt an updated Hollywood Community Plan that protects hillside neighborhoods, such as Outpost Estates.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 42-2

The comment indicates that the operating conditions reported in Figures 4.15-2 and 4.15-3 do not reflect current conditions in the study area. The comment states that during the AM peak period, Sunset Boulevard through West Hollywood is shown as being acceptable when traffic congestion backs up into Hollywood and that La Brea Avenue is also shown as acceptable when there is often congestion. The comment also states that during the PM peak period, Highland Avenue north of Hollywood Boulevard to Franklin Avenue is shown as acceptable when congestion often occurs, and that Hollywood and Sunset Boulevards are also shown as acceptable in the central part of Hollywood Business District where congestion occurs.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. Refer to **Response 27-19**.

Response 42-3

The comment states that the John Anson Ford Theatres and Universal Studios are not included in the description of special events. The comment also states that the traffic data is incomplete because it was only collected on a Tuesday, Wednesday and Thursday, which does not reflect traffic conditions for special events, and that special events in Hollywood occur year-round and up to seven days a week.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. The discussion of special event traffic operations was updated (see pages 4.15-24 and 4.15-25). Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 42-4

The comment refers to Tables 4.15-8 and 4.15-9, which includes a comparison of future traffic conditions under each alternative and states that the No Project alternative is environmentally superior to the transportation impacts identified in the Proposed Project.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. The specific tables referred to in this comment have been re-numbered as Tables 4.15-11 and 4.15-12 and show that the weighted average V/C ratios and corresponding LOS would worsen under future year conditions with the Proposed Plan under both transportation improvement treatment options in comparison to existing conditions. However, no significant transportation impacts would

occur under the City's current thresholds which are based on total daily VMT per service population. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 42-5

The comment expresses concerns with the impact analysis conducted for residential streets and states that the impacts of neighborhood traffic intrusion generated by project-related traffic will not be mitigated. The comment states that Mitigation Measure **T2** is inadequate and should be binding, not "as resources permit," and suggests that the impact conclusion is significant and unavoidable, but the commenter also states the impacts are significant and unacceptable.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743, including emergency access.

Response 42-6

The commenter is stating that the mitigation measures identified in the EIR require funding and that a Nexus Study should be completed before the EIR is certified by City Council.

The Nexus Study requested in the comment is included in the EIR as Appendix K, published in 2018. This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. The impacts concluded in the recirculated Section 4.15 are less than significant and mitigation measures are not necessary. Please also see **Master Response No. 8 – Transportation & Traffic**.

LETTER NO. 43

Susan Hunter, President
SaveHollywood.Org
2751 Westshire Drive
Los Angeles, CA 90068

Response 43-1

The commenter expresses concern that the intent of the EIR and the intent of the Plan are becoming muddled. The commenter requests that a copy of the comment letter is submitted for response to the EIR and the Proposed Plan itself.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please refer to **Responses 43-2** through **43-10** for responses on specific concerns.

Response 43-2

The comment states that the Plan focuses development in areas that have the highest concentration of RSO units, which conflicts with the Plan's goal to preserve RSO housing, and does not include regulations to preserve RSO units. The comment also states that the EIR does not include findings on the conflict of inducing areas of development in places designated for preservation, and states that the Plan and EIR should analyze other housing options such as co-ops and social housing.

To the extent that the commenter is saying the project conflicts with historic preservation, page 4.5-44 of Section 4.5, Cultural Resources, of the EIR provides a detailed discussion on the Proposed Plan's impact on historical resources (defined by CEQA Guidelines Section 15064.5). As discussed in this section of the EIR, even though the Proposed Plan incorporates changes that would assist in further protecting both designated

and eligible historical resources, it is still possible that demolition and/or significant alteration to some of the hundreds of historic resources within the Hollywood CPA would occur during the life of the Proposed Plan. Therefore, the EIR determines that the Proposed Plan's impact related to historical resources would be potentially significant, and since no feasible mitigation to prevent the demolition or substantial alteration of historical resources was identified, the impact was determined to be significant and unavoidable.

To the extent that the commenter is saying the project conflicts with policies for preservation of RSO units, the comment regarding RSO units and housing options raises social and economic issues and the commenter has not provided substantial evidence to show the social and economic impact will occur or that an environmental impact will result from the social and economic impact. Page 4.13-14 of Section 4.13, Population and Housing, of the EIR provides a discussion on indirect displacement of existing housing and notes that it is not necessarily a CEQA issue unless it is shown that the loss of affordable housing and displacement would result in a physical impact to the environment, such as from construction of new housing elsewhere. The Proposed Plan does not propose the demolition, conversion to market rate, or removal of any existing residential units and is expected to result in a net increase of housing over existing conditions and would allow a variety of new housing types. Therefore, it is not expected to result in permanent displacement of housing or people. Additionally, pages 4.10-17 through 4.10-25 of Section 4.10, Land Use and Planning of the EIR concludes that there are no conflicts with existing land use plans. There are several residential neighborhoods in the CPA where housing units are subject to RSO requirements because of the age of the housing stock in Hollywood. The Proposed Plan is not internally inconsistent with plan policies related to retaining RSO housing stock because it generally maintains the base zoning of these areas and does not increase the base allowable density. Residential areas with High Residential, Medium Residential, Low Medium II Residential, and Low Medium I Residential land use designations are being maintained throughout the CPA. In a few selected High or High Medium Residential areas, the Proposed Plan incentivizes housing by requiring projects to set aside a certain percentage of affordable housing on site. These areas are generally located near the Hollywood/Highland Metro B (Red) Line station, the Hollywood/Vine Metro B (Red) Line station, and Paramount Pictures. Projects with existing RSO units are also required to replace them in the new development.

The Commenter does not provide any evidence that there is a conflict with existing policies, including policies adopted to avoid or mitigate an environmental effect. Additional regulations for RSO units and more housing options would not reduce any of the significant and unavoidable impacts to a less than significant level. Policy 5.17 in the Community Plan considers cohousing. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

See also **Master Response No. 6 – Displacement and Affordable Housing**.

Response 43-3

The comment states that the EIR did not analyze the impact of the Plan not complying with CRA's Hollywood Redevelopment Plan's affordable housing requirement and does not analyze compliance with AB 1505 for affordable housing requirements (inclusionary housing) or SB 827.

AB 1505 restored the authority of local governments to apply inclusionary housing policies to rental housing. It does not mandate inclusionary zoning. The California legislature did not pass SB 827 so it is not part of the existing regulatory framework. Compliance with AB 1505 and SB 827 do not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Refer to **Response 39-3**.

Response 43-4

The comment summarizes the discussion on the CEQA Guidelines' guidance for indirect environmental impacts of a project's economic and social impacts included in Section 4.13, Population & Housing, of the EIR. The comment states that the Plan does not have affordable housing requirements or a definitive plan on how to preserve RSO units, therefore the CPA will only be accessible to high-income earners, would lead to displacement and gentrification, and high vacancy rates. High vacancy rates would lead to blight, which would be an aesthetic impact. The commenter also states that Goal 4.2 (Policy LU4.2 Mixed-income neighborhoods) fails to also include the oversaturation of market rate/luxury housing as a concern.

Please see **Master Response No. 6 – Displacement and Affordable Housing** for a discussion on displacement and affordable housing. The comment regarding Policy LU 4.2 of the Community Plan does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. The commenter does not provide substantial evidence to support the claim that the Proposed Plan will result in blight from displacement and vacancies. Therefore, no further response is necessary. See also **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 43-5

The comment states that the EIR should include an alternative for a case where the population drops or does not expand as expected increase due to migration out, decrease in birth rates, and deaths. The comment goes on to note that Hollywood lost 12,000 working class families in 2012, and therefore there is no rationale for additional housing unless the population is known to increase.

Please see **Master Response No. 2 – Population, Housing, and Employment**. Pursuant to CEQA Guidelines Section 15126.6, an EIR must address a range of reasonable alternatives to the project that feasibly achieve most of the project objectives, and would avoid or substantially lessen any significant effects of the project. The underlying purpose of the Proposed Plan is to accommodate projected population, housing, and employment growth consistent with the growth strategies of the Framework Element (Draft EIR on page 3-13.) A project Alternative that reduces future development of new housing would be inconsistent with one of the Project's primary objectives. CEQA does not require the Lead Agency to analyze an alternative that does not meet one of the basic objectives of the Project. It also does not require the Lead Agency to consider every conceivable alternative to a project, but rather requires the Agency to consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Pursuant to Section 12126.6(f) of the CEQA Guidelines, which outlines the "rule of reason" for selecting the range of alternatives, an EIR is required to consider a range of alternatives necessary to permit a reasoned choice. The EIR at pages 5-4 and 5-5 explains why a no development or limited development alternative is not feasible. Additionally, the EIR analyzed a No Project alternative, that would not add more density to the Plan in Chapter 5, starting at page 5-10. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 43-6

The comment states that the EIR fails to account for housing constructed between 2010 and 2019, claiming that the CPA already has the 10,000 units needed to accommodate projected growth.

CEQA requires comparing the baseline existing conditions to the conditions after the implementation of the Proposed Plan. The baseline existing conditions was 2016, when the NOP was published. Several data sources indicate a baseline of approximately 104,000 units; see Table 1 in Appendix B - Methodology. The EIR adequately analyzes the units reasonably expected from 2016 to 2040. Please also refer to **Master Response No. 2 – Population, Housing, and Employment** and Appendix B, Methodology.

Response 43-7

The comment states that the presence of Alquist-Priolo Earthquake Faults in the CPA and fire concerns call for an emergency plan in the Proposed Plan as well as supporting studies in the EIR. The comment cites a 2017 publication that discusses earthquakes triggered by human activity and suggests that the CPA may be subject to seismic activity caused by human activity associated with oil and gas industry activities.

Please see **Response 15-4**-regarding the analysis of seismic hazards in the EIR and **Response 18-1** regarding emergency planning.

Response 43-8

The comment expresses concern that the CPA is saturated with alcohol licenses and tourism which places increased pressure on emergency services which, the commenter argues, will be further worsened by increased population within the CPA.

The comment does not provide substantial evidence to support that an environmental impact will occur based on "saturation of licenses." No further response is necessary.

Response 43-9

This comment states that the EIR fails to acknowledge necessary updates to infrastructure issues and what the environmental outcome will be if water transportation and sewer system are not updated. The comment further states that the EIR fails to acknowledge the significant impact on infrastructure due to a cited human waste crisis that will impact Los Angeles in 2024. The comment cites the 2017 EIR of the proposed Crossroads development project stating that this one project results in a significant impact requiring the construction of a new wastewater treatment facility.

Contrary to the comment, the EIR prepared for the Crossroads Hollywood Project determined that impacts related to wastewater would be less than significant. The comments provide no substantial evidence that there will be a human waste crisis supporting the need for different analysis or conclusions from those in the EIR. Please see **Master Response No. 4 – Infrastructure**.

Response 43-10

The comment states that Hollywood is not prepared for a "large-scale event" triggered by development, but does not specify the large-scale event. The comment also references Judge Goodman's decision on the previous Plan and EIR citing inconsistencies and flaws in the analysis and Plan.

The comment about large scale events triggered by development is a general statement and is based on the commenter's opinion and not supported by substantial evidence. Refer to **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 44

Don Hunt, President
South Hollywood Neighborhood Association

Response 44-1

The commenter summarizes concerns regarding the protected bike lane on Melrose Avenue between La Cienega Boulevard and Highland Avenue and concerns of traffic congestion resulting from the removal of vehicle travel lanes.

In comparison to Mobility Plan 2035, a portion of Melrose Avenue between Vermont Avenue and Hoover Street was converted from a Bicycle Enhanced Network (BEN) to a Neighborhood Enhanced Network

(NEN) due to roadway width and available right-of-way in the Proposed Plan. For the segment of Melrose Avenue that would remain part of the BEN, two roadway configurations were considered in the impact analysis. Treatment Option 1 was assumed to implement peak period parking restrictions with two vehicle lanes in each direction resulting in two travel lanes during peak periods and one vehicle lane per direction with on-street parking during off-peak periods. Treatment Option 2 was assumed to implement one vehicle lane in each direction with parking permitted all day.

Section 4.15 describes the existing traffic operations and congestion levels in the Plan Area (pages 4.15-9 through 4.15-18). This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**. The comment will be provided to the decision-maker prior to its decision on the Proposed Plan.

Response 44-2

The comment states that an attached map provided by the commenter shows that on a weekday at 2:00 p.m., there were no cyclists and two scooters observed traveling westbound along Melrose Avenue from Normandie to La Cienega. The comment states the proposed bike route would be disruptive and endanger the lives of cyclists, pedestrians and drivers, and that bike lanes should be added instead to side streets, such as Waring Avenue and Romaine Street, that can be safer for cyclists.

The Mobility Plan 2035 currently assigns the portion of Melrose Avenue from Normandie to La Cienega to the Bicycle Enhanced Network (BEN), and the Community Plan proposes to maintain this designation for this portion of Melrose Avenue. The commenter does not provide substantial evidence to support that striping bike lanes along Melrose Avenue would endanger people who ride bicycles. The portion of Melrose Avenue between La Cienega Boulevard and Highland Avenue is on the City's High Injury Network (HIN) where 60 percent of severe and fatal traffic collisions occur. Bike lanes are a widely recognized safety counter measure that have demonstrated reduced collisions where installed, especially those affecting people that walk and bike. In addition, an objective of the City's Mobility Plan 2035 is to attract greater bike ridership by building more complete infrastructure that meets the needs and perceptions of people that may want to bike and walk more. Furthermore, this is a plan level analysis and LADOT would evaluate trade-offs in travel delay, safety, and improving access to destinations by people that walk and bike before any bike lane is installed by the City.

LETTER NO. 45

Shane Stuart Swerdlow, Project Manager
Craig Lawson & Co., LLC
3221 Hutchison Avenue, Suite D
Los Angeles, CA 90034

Response 45-1

The comment supports the proposed zoning of Subareas 13:6D and 13:6E along Sunset Boulevard. The comment states that the proposed zoning would enable new mixed-use development that would complement the existing scale of the neighborhood.

Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 46

Casey Maddren, President
United Neighborhoods for Los Angeles

Response 46-1

The comment discusses the City's re:code program and expresses concern that the EIR analyzes the existing LAMC zoning and not the possible impacts after the application of re:code. The comment asks why the Hollywood Community Plan Update was not prepared with new re:code zoning categories. The comment expresses concern that once re:code is adopted different zoning categories would be applied to the Hollywood Community Plan Update and that the EIR fails to analyze the impacts from applying the re:code zoning to the Plan Area.

The Hollywood Community Plan is not applying the re:code zoning, which is also referred to as the New Zoning Code. The New Zoning Code cannot be applied in the future to the Plan Area without a new Community Plan Update. The existing Chapter I of the LAMC will continue until all community plan areas are updated with the New Zoning Code. There is no basis to find that the EIR failed to analyze a foreseeable project of applying the New Zoning Code to the Plan Area as that project is not proposed at this time and is speculative.

For clarification, re:code LA is the comprehensive revision of the City's zoning code and will be implemented through community plan updates through the creation of a new chapter in the LAMC Chapter 1A. The development, adoption, and application of the New Zoning Code to a Community Plan Area occurs as part of a Community Plan Update.

When the Hollywood Community Plan Update launched in the spring of 2016, concepts for the New Zoning Code were still under study and in the early stages of development. The direction at that time was to proceed with the Hollywood Community Plan Update, independent of the new zoning code. The Hollywood Community Plan Update is applying zoning regulations codified in the current LAMC, and through this community plan update the LAMC allows for a community plan update process to introduce updated zoning regulations (LAMC Section 12.32 – Legislative Actions).

When the Hollywood Community Plan update is adopted and implemented, it will maintain the existing LAMC regulations under which it is adopted in Chapter 1. The New Zoning Code, in Chapter 1A, cannot automatically be applied to the Hollywood Community Plan nor any Community Plan Area without a Community Plan update.

While the Proposed Plan has incorporated some New Zoning Code concepts into the proposed zoning for Hollywood, including the pedestrian-oriented design regulations found in the Hollywood Community Plan Implementation Overlay (CPIO) and in the Q conditions and D Limitations, the New Zoning Code is not being applied through this Community Plan Update. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 46-2

The commenter points out that the Plan states it is consistent with the SCAG 2016–2040 RTP/SCS and therefore assumes improvement in air quality. But the commenter says the RTP/SCS has not been a successful plan. The comment states that Californians have increased driving in recent years and that improvements to air quality are from the State's progress in renewable energy generation. The commenter states that the City has allowed additional zoning for transit-oriented development but transit ridership is falling and congestion has not been alleviated. The comment further states that "Rush hour congestion on Sunset, Cahuenga, La Brea, Franklin, and the Hollywood Freeway have continued to worsen. At the same

time, secondary streets such as Wilcox, Gower, Argyle, and DeLongpre are now backed up with rush our traffic." As such, the commenter concludes that the DEIR's conclusions regarding future air quality under the HCP Update cannot be considered credible." Furthermore, the comment suggests that the EIR air quality analysis claims that the Proposed Plan's "compatibility with SCAG's 2016-2040 RTP/SCS will reduce emissions."

The commenter presents their opinion about the SCAG RTP/SCS and its effectiveness as a plan to reduce emissions and expresses concerns about congestion during rush hour. The comment does not raise any new significant environmental issues, nor does the comment provide substantial evidence that addresses the adequacy of the analysis included in the EIR.

As stated in Chapter 2.0, Summary, on page 2-2, the project's objectives are consistent with the SCAG RTP/SCS. In assessing the potential impacts of the Plan, the City is not required to determine if RTP/SCS has been successful in achieving SCAG's objectives. The EIR demonstrates that the Plan would be consistent with the current RTP/SCS as shown in Table 4.10-2 on pages 4.10-18 and 4.10-19. The comment does not provide evidence to the contrary. Consistency with the SCAG RTP/SCS is related to regional growth projections and per capita GHG emission targets, and the air quality analysis in the EIR does not assert that compatibility with the SCAG projections is responsible for reducing emissions. The air quality methodology makes use of the land use development and mobile source emissions models that are preferred and promulgated by the SCAQMD and other regulatory agencies. The reduction in air pollutant emissions is predominantly attributed to mandated control programs for mobile and stationary emissions sources that are administered by the state (the CARB) and regional (the SCAQMD) agencies. The comment is inaccurate in its suggestion that the EIR hinges its demonstration of emissions reductions on consistency with the SCAG RTP/SCS.

Response 46-3

The comment claims that the data presented in the EIR demonstrates that the Proposed Plan will increase GHG emissions and that the City should not adopt the Proposed Plan because the existing 1988 plan provides enough capacity for growth. The comment also presents excerpted data from CARB's 2018 progress report which shows that California is not on track to meet GHG reduction goals required under SB 375 because personal vehicle emissions are increasing rather than decreasing, statewide. As a result, the comment states that the analysis in the EIR is inadequate because consistency and concurrence with SCAG's RTP/SCS does not mean being able to meet SB 375 GHG reduction goals.

The comment appears to suggest that emissions under the Existing Plan would be lower than the Proposed Plan in 2040 and therefore there is no reason to adopt the new plan, since the existing plan provides enough capacity for growth based on the SCAG projections. See **Master Response No. 2 – Population, Housing and Employment** as to why the City is doing the Proposed Plan.

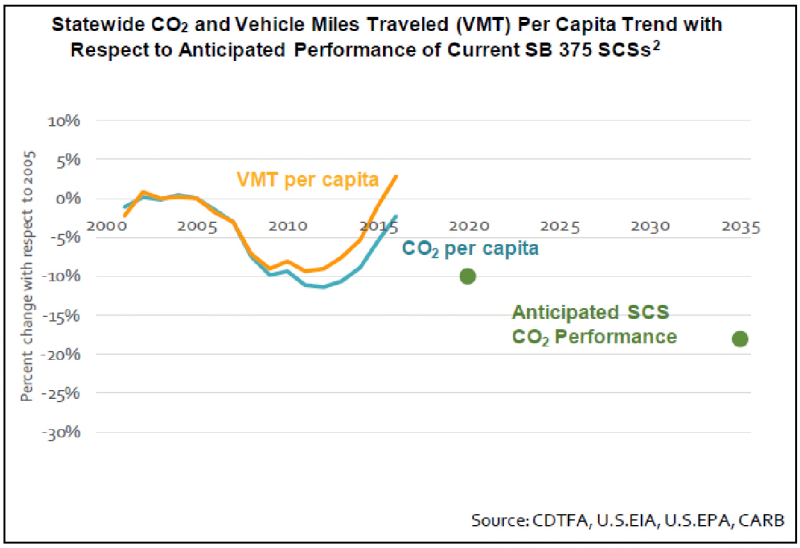
Consistent with the State CEQA Guidelines, the GHG Emissions impact conclusion in the EIR is based on comparing future emissions under the Proposed Plan to emissions in the existing/baseline year. Table 4.7-3 does not show that the Proposed Plan would cause a significant increase in GHG emissions. As shown in Table 4.7-3, annual emissions of GHG within the Project Area based on the 2040 Reasonably Expected Development of the Proposed Plan would be less than existing Project Area land use emissions by approximately 133,202 $MTCO_2e$ per year (or about eight percent less than existing emissions). Compared to the Existing Conditions, the Proposed Plan would result in a reduction in annual GHG emissions within the Project Area. The CEQA Guidelines do not require a comparison to a future emissions scenario without implementation of the project as a basis for determining the significance of GHG emissions. The comment's assertion that GHG emissions from transportation, natural gas, electricity, water, and wastewater would increase significantly with implementation of the Proposed Plan is not accurate as it refers to an emissions comparison that does not inform the conclusion related to the potential significance of impacts. Therefore,

the comment does not provide substantial evidence demonstrating that new or revised analysis of environmental impacts related to GHG emissions is warranted.

Regarding SB 375 and consistency with the RTP/SCS, the CARB develops regionally-specific GHG emission reduction targets to meet the statewide goals and approves SCS documents prepared by the Metropolitan Planning Organizations (MPOs) based on their ability to comply with those regional reduction goals. The CARB approved the 2016–2040 RTP/SCS SB 375 target consistency demonstration on June 28th, 2016 (Executive Order G-16-066), and the CARB approved the Connect SoCal 2020–2045 RTP/SCS SB 375 target consistency demonstration on October 30, 2020 (Executive Oder 20-624-1). CARB approval of the SCAG SCS documents represensts formal regulatory acknowledgement that the plans were prepared to achieve the regional reduction targets for the SCAG region established by CARB staff pursuant to SB 375. It is not within the purview of the City as the Lead Agency to assess whether the SCS documents prepared by SCAG or the regional targets established by CARB pursuant to SB 375 are sufficient to meet the statewide GHG emission reduction goals, and it is established industry practice to rely on consistency with SB 375 regional targets and GHG emission reduction strategies to substantiate less than significant environmental impacts. The State CEQA Guidelines Section 15064.4(b) promulgate that, "[a] lead agency should consider… [t]he extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions." Furthermore, it is not the responsibility of the Lead Agency to determine whether other regions of the state are meeting their regional GHG emission reduction targets established by the CARB. As the SCAG SCS was approved by the CARB and determined to achieve the SCAG regional targets pursuant to SB 375, the EIR analysis is sufficient to demonstrate a less than significant impact, and the comment does not provide substantial evidence toward requiring new or additional analysis.

The comment relies on excerpted information from the CARB *2018 Progress Report – California's Sustainable Comunities and Climate Protection Act* to suggest that the SCS consistency analysis is meaningless because statewide per capita VMT are increasing in recent years, based on a trend from approximately 2011–2016 (figure reproduced below). However, the comment omits the language following the figure, which states that, "[w]hile overall, California has hit its 2020 climate target ahead of schedule due to strong performance in the energy sector, meeting future targets will require a greater contribution from the transportation sector" (page 5). Thus, CARB acknowledged that the State has already achieved the 2020 reduction goal established by AB 32. Furthermore, the 2016–2040 RTP/SCS is only the second iteration of the RTP prepared by SCAG since the adoption of the Sustainable Communities and Climate Protection Act, and the emissions horizon presented in the figure below does not account for the reductions that could be achieved in future years. The data presented in the figure are based on statewide gasoline fuel sales data, and are heavily influenced by statewide economic patterns following the economic recession that occurred in the late 2000s. Ultimately, past trends in statewide per capita VMT and associated emissions are not indicative of the potential future success of SCS planning initiatives, and the comment has not offered substantial evidence that new or additional analyses are required within the EIR.

Exhibit: Excerpt from CARB 2018 Progress Report



The Proposed Plan is designed to accommodate efficient growth within the SCAG region and maximize utilization of the transportation corridors and public transit opportunities. This is evident by the demonstrated decrease in per capita CO_2 emissions shown in Table 4.7-4 on page 4.7-22 of the EIR. Implementation of the Proposed Plan would reduce per-capita CO_2 emissions from passenger vehicles by approximately 8.3 pounds per day relative to Existing Conditions and by approximately 0.7 pounds per day relative to the Future (2040) No Project/Existing Plan (comparison to Existing Plan is provided for informational purposes and not for impact analysis). Under the Proposed Plan, per-capita CO2 emissions would be reduced by approximately 37 percent relative to the 2005 SCAG Regional baseline levels examined under SB 375. The 37 percent reduction resulting from the Proposed Plan is more than SCAG's 21 percent reduction target of the 2016–2040 RTP/SCS. This would seem to support that the Proposed Plan is consistent with SB 375. However, as discussed in the EIR, there is no numerical threshold for the City to use, even when comparing to SCAG's regional SCS target because SCAG does not break down targets by jurisdiction and every jurisdiction has different conditions with respect to available transit and employment centers. But as discussed in the EIR, the City is consistent with SCS policies. By guiding development near transit corridors and encouraging creative mixed land uses, the Proposed Plan creates an efficient strategy for reasonably foreseeable development in the region, consistent with AB 32, SB 32 and the 2016-2040 RTP/SCS.

The comment also mentions that additional issues related to the displacement of low-income households and promoting the use of electric vehicles should also be addressed. Refer to Section 4.13, Population, Housing and Employment, for a discussion of the protections from displacement. Alternative fuel and electric vehicle charging infrastructure is an element addressed in the City's Green Building Program. Each individual land use development within the HCP area would be required to comply with the contemporary iteration of the Los Angeles Green Building Code at the time building permits are issued, and all provisions related to the expansion of electric vehicle charging infrastructure would be adhered to.

Response 46-4

The comment states that the Proposed Plan's reasonably expected development is significantly more than what SCAG projects by 2040. The comment states that the 1988 Hollywood Community Plan's expected numbers also exceed what SCAG is projecting by 2040, and so the Proposed Plan's upzoning in many areas is not justified. The comment also questions that if larger projects can be built by right, what would motivate developers to provide affordable housing. The comment expresses concern that the upzoning included without provision of affordable housing in the Plan Update would be a mistake.

Please see **Master Response No. 2 – Population, Housing, and Employment**. It is a policy decision to direct the reasonably expected development in the Plan Area as it meets goals of the Framework Element and the SCS to put growth near transit. Nothing about the Proposed Plan supports that it will result in a significant impact from inducing growth and the commenter has not provided any substantial evidence that it will. Additionally, the 1988 Plan's reasonably expected numbers in 2040 may be more than what SCAG projects for 2040 due to the possible use of affordable housing incentives, such as the Transit Oriented Communities program, that were implemented after SCAG's 2016-2040 RTP/SCS was adopted in 2016. But, as explained in Chapter 5.0 Alternatives of the EIR, the existing 1988 Plan (No Project Alternative), would not achieve most of the Proposed Plan's primary and secondary objectives. It would not direct growth and maximize development opportunities around existing transit systems, transit hubs, and corridors. Known inconsistencies between land uses, zoning, and General Plan land use designations would not be corrected or updated. In addition, future development would not be subject to the Proposed Plan's design, neighborhood compatibility, and hillside protections. The CPIO District, which would have regulatory protections for historical resources as well as pedestrian-oriented design regulations, would not be established. Transportation and mobility network improvements under the Proposed Plan would also not be implemented. The updated Hollywood CPIO (see Final EIR Updated **Appendix E)** provides updated information about the affordable housing incentive system under the Proposed Plan. Development incentives in the CPIO, such as increased density or floor area, are tied to the provision of on-site affordable housing at specified levels and percentages. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 46-5

The comment expresses concern about incentivizing hotel uses over residential uses in some areas of the Hollywood Community Plan.

Under the Proposed Plan, hotels are not eligible for development incentives and are further regulated through the Hollywood CPIO. The CPIO prohibits hotel development in the Multi-family Residential subareas and requires a Conditional Use Permit for hotels in the Regional Center subareas that would remove any existing residential units. Please see the Hollywood CPIO document for more information. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 46-6

This comment states that since the EIR shows that the existing 1988 HCP provides the capacity to house SCAG's projected 2040 population, and since the EIR also shows that adoption of the Proposed Plan would lead to greater water use, greater waste generation, and increased fossil fuel emissions, the environmentally preferable action is to reject the Proposed Plan.

The Hollywood Community Plan update is proposed in order to meet a number of State, regional, and city goals. Based on the comparative evaluation of the project objectives (see Table 5-1 in Chapter 5.0, Alternatives), in contrast to the Proposed Plan, none of the alternatives would meet the primary or secondary project objectives or the underlying purpose as well as the Proposed Plan, including because they would not meet the growth strategies of the Framework Element as well as the Proposed Plan, and the policies of

SB 375 and the SCS to increase density around transit and regional centers. Furthermore, each of the alternatives discussed in Chapter 5.0 of the EIR would result in significant and unavoidable impacts including the No Project Alternative which would be a continuation of the existing 1988 HCP. Chapter 5.0 of the EIR discloses that the Environmentally Superior Alternative would be the Reduced Alternative (Alternative 2) as discussed on page 5-37. However, while Alternative 2 was found to reduce impacts on air quality, GHG emissions, noise and traffic when compared to the Proposed Plan, these impacts would remain significant and unavoidable regardless of the reduction in severity. Moreover, the comment fails to recognize that the plan is a growth accommodating plan. It does not necessarily follow that if the City does not update the Community Plan, the growth will not occur in the Plan Area or other areas of the City or other areas of the SCAG region and place demands on services and utilities and create air quality emissions, GHG emissions, noise and traffic and that any such impacts would be less than they would be with the Proposed Plan. It could result in growth in areas where impacts could be greater. The commenter does not provide substantial evidence to support its conclusion that the No Project alternative is environmentally superior to the Proposed Plan.

Response 46-7

The comment states that the Plan relies on the SCAG RTP/SCS for justification and that the commenter disagrees with the strategies contained in SCAG's Sustainable Communities Strategy related to increased densities around transit stations to encourage transit usage and increase ridership. The comment also states concerns over recent declines in transit system wide ridership and includes overall ridership information for the Metro system in 2018 compared to 2010, and LADOT overall ridership for fiscal years 2012, 2013 and 2014.

Please see **Response 15-8** for additional information on transit ridership.

Response 46-8

The comment states that water infrastructure is old and in disrepair, citing a Los Angeles Times mapping application and several specific events of pipe leaks and breaks dating between 2010 to 2014. The comment goes on to state that while LADWP has plans to update water infrastructure in several parts of the CPA, no work has been done and further claims that funding for LADWP work will not be provided by developers since LADWP is funded by ratepayers rather than through development fees. The comment concludes that the EIR conclusion that the Proposed Plan will not cause significant impacts to water infrastructure is not credible given the information provided by the commenter.

Please see **Response 36-76** and **Master Response No. 4 – Infrastructure**. The Los Angeles Times mapping application documenting numerous water leaks throughout the Hollywood area and beyond was reviewed; however, neither the map nor the comments provide substantial evidence supporting the need for different analysis or conclusions from those in the EIR.

LETTER NO. 47

Jordan R. Sisson, Law Clerk
Law Office of Gideon Kracov
801 South Grand Avenue, 11th Floor
Los Angeles, CA 90017

Response 47-1

The comment states several concerns about the Proposed Plan, including incentivizing commercial development over residential development, upzoning areas without requiring affordable housing, and not complying with Measure JJJ. For these reasons, the comment requests that the Project include a new project alternative that complies with Measure JJJ and that the EIR be recirculated.

The commenter argues a new alternative is necessary because of a land use impact from the Proposed Plan's inconsistency with TOC and Measures JJJ. The commenter provides no substantial evidence to support a conflict of the Proposed Plan with TOC and Measure JJJ or that TOC and Measure JJJ were adopted to avoid or mitigate an environmental impact (as required under the significance threshold for a land use impact under CEQA). The commenter cannot provide such evidence because Measure JJJ and TOC. The Proposed Plan is consistent with TOC and Measure JJJ. First the CPIO includes a density bonus incentive system compliant with Measure JJJ as codified at LAMC Section 12. 22.A.31(d). Second, consistent with the requirements in LAMC Section 11.5.8 and JJJ, the City prepared a comprehensive assessment of the Plan Update to ensure the Plan Update will not reduce the capacity for creation and preservation of affordable housing and access to local jobs and will not undermine Cal Gov Code Section 65915 or any other affordable housing incentive program. Additionally, the Proposed Plan includes a program to create and monitor an inventory of units within the CPA that are: subject to a recorded covenant, ordinance or law that restricts rent to levels affordable to persons and families of Lower or Very-Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very-Low Income households. See the CPC Staff Report for Case No. CPC-2016-1450-CPU. See **Response 10-4** regarding the discussion of Measure JJJ.

Please see the Proposed CPIO (Final EIR Updated **Appendix D**), and **Master Response No. 6 - Displacement and Affordable Housing** for more information. Moreover, the analysis required under 11.5.8 for amending the community plan was conducted and is provided in the Staff Report. The request to recirculate the EIR is not warranted per Section 15088.5 of the CEQA Guidelines, which states that recirculation of an EIR prior to certification is required when new information is added that discloses a new significant environmental impact, a substantial increase in the severity of a previously identified impact, a new alternative or mitigation measure that would reduce the severity of impacts but is not adopted, or if it is determined that the Draft EIR was fundamentally inadequate and conclusory in nature that meaningful public review and comment were precluded.

Response 47-2

The comment states that the Proposed Plan would have a net increase of three acres of commercial uses while there would be a loss of 187 acres of residential uses.

The comment does not present a full picture of the change in land use acreages. Table 3-10 in the Project Description of the EIR includes a note explaining that much of the residential change in acres is due to an administrative land use designation correction from residential to open space. This administrative land use designation correction primarily occurs in the hillside areas of the CPA, where parcels of land are owned by open space conservation agencies. The existing use of these parcels is already open space, without plans for housing, such as Subarea 70, a part of Griffith Park. Since the publication of the EIR in 2018, there have been additional small adjustments to the acreage of proposed land use designations, in part due to approved entitlements in the past few years as well as from the consideration of public comments received. Please see Table 1: Comparison of Proposed Land Use Designation Acres in the Staff Report for CPC-2016-1450-CPU. As stated in the Staff Report, the acreage adjustments of land use designation between the publication of the EIR and January 2021 have been minimum, usually in the range of plus or minus 1 percent to 3 percent. Please see the Staff Report for CPC-2016-1450-CPU for more information. Therefore, although it appears that there is a reduction of residential acreage it is only a technical change because the land was already being used as open space or purposely kept vacant for conservation purposes. The note was added to Table 3-10 to clarify the change but perhaps it was missed by the commenter. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Response 47-3

The comment states that the Proposed Plan is not consistent with Measure JJJ because it includes FAR increases without requiring affordable housing. The commenter cites several subareas as examples, and also notes a sample project that is using the City's TOC Guidelines to increase allowable FAR from 3:1 FAR to 4.25:1 FAR. The comment notes that under the Proposed Plan a developer would be able to access this FAR

increase without providing affordable housing units. Therefore, the commenter requests that the Plan be revised so that increases to FAR are tied to affordable housing, which would include revisions to proposed "Q" Conditions and "D" Limitations. The commenter also requests that the Plan incorporate mandatory affordable housing with reporting requirements that were included in the Hollywood Redevelopment Plan, and also requests that commercial development projects that seek additional FAR provide specific findings that meet environmental goals (such as transportation demand management strategies, bike paths, trees and vertical forests on buildings, open space provisions).

The Proposed Plan's CPIO complies with Measure JJJ by including a community plan "TOC" program and incentivizes affordable housing by asking applicants to provide affordable housing for additional floor area ratio in selected areas of the Community Plan Area, such as in Central Hollywood (the Regional Center) and along commercial corridors served by transit systems. Please see the Hollywood CPIO (Final EIR Updated **Appendix D**), and **Master Response No. 6 - Displacement and Affordable Housing** for more information. Please refer to the CPC Staff Report for Case No. CPC-2016-1450-CPU for information on the Plan's consistency with Measure JJJ. This comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. The comment will be provided to the decision-maker for its consideration prior to Proposed Plan approval.

Response 47-4

The comment states that hotels should not be incentivized over housing and suggests revising the policy language to reflect this change.

Please refer to **Response 39-4**. This comment will be provided to the decision-maker for its consideration prior to adoption of the Proposed Plan. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 47-5

The comment states that hotels should not be allowed by right in the Regional Center when located further than 500 feet of a residential zoned area, and should be subject to conditions.

Hotel uses and discretionary actions are addressed and regulated by LAMC Sections 12.00 through 12.24(W).24. The Hollywood CPIO requires a Conditional Use Permit for hotels in the Regional Center subareas that would remove any existing residential units. Please see the Hollywood CPIO document for more information. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 47-6

The comment cites the number of evictions in Council Districts 4 and 13 and several development projects that have converted or removed rent stabilized housing units to develop new hotels. The comment states that the Plan incentivizes by-right hotel development by increasing allowable FAR, particularly in Regional (Center) Commercial zones because the only discretionary action would be Site Plan Review, which according to the commenter lacks Code-required findings regarding the Project's impact on rent-stabilized housing stock.

Under the Proposed Plan, hotels are not eligible for development incentives and are further regulated through the Hollywood CPIO District. The CPIO prohibits hotel development in the Multi-family Residential subareas and requires a Conditional Use Permit for hotels in the Regional Center subareas that would remove any existing residential units. Please see the updated Hollywood CPIO document for more information (Final EIR Updated **Appendix E**). The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Responses 47-7 and 47-8

The comment suggests including policy language to encourage good paying local jobs. The comment also states that the proposed CPIO should be revised to reflect the issues and recommendations previously stated in earlier comments of the letter.

Policy LU9.7 encourages local jobs in the Community Plan. Please refer to the Hollywood CPIO (Final EIR Updated **Appendix E)** for more information. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR.

Response 47-9

The comment states that the Proposed Plan and EIR show a preference for commercial/hotel development over residential uses and in particular, affordable housing incentives provided under Measure JJJ and TOC Guidelines. The comment states that the Proposed Plan conflicts with City Code and constitutes a significant land use impact which was not analyzed or mitigated by an adequate range of project alternatives. The comment recommends the Proposed Plan and EIR be revised to include a project alternative that incorporates the suggestions provided in the preceding comments.

Under the Proposed Plan, hotels are not eligible for development incentives and are further regulated through the Hollywood CPIO. The CPIO prohibits hotel development in the Multi-family Residential subareas and requires a Conditional Use Permit for hotels in the Regional Center subareas that would remove any existing residential units. Please see the Hollywood CPIO document for more information. Please also see **Master Response No. 6 – Displacement and Affordable Housing**. **Master Response No. 6 – Displacement and Affordable Housing** demonstrates that changes related to affordable housing supply are not CEQA impacts and thus there is no requirement to develop a Project Alternative that reduces this particular impact. Please also see the CPC Staff Report for Case No. CPC-2016-1450-CPU for more information about the Plan's compliance with Measure JJJ.

Response 47-10

The comment states that the City will not be able to approve the Proposed Plan without adopting a Statement of Overriding Considerations (SOC). The comment also states that the EIR fails to make a meaningful attempt to determine whether new jobs encouraged by the Proposed Plan will be for highly trained workers or what the likely salary and wage ranges would be under new development contemplated under the Proposed Plan. The comment states this assessment is required to support a SOC.

A SOC is anticipated in order to approve the Proposed Plan, but the SOC is adopted as part of the Plan adoption process and was not developed at the time the EIR was published in November 2018. The SOC needs to provide enough information to decision makers to show that the environmental consequences of a Project are "acceptable" given the overriding considerations (i.e., specific economic, legal, social, technological, or other benefits) of the Project (PRC Section 21081(b); CEQA Guidelines Section 15093). Economic considerations such as job quality are not CEQA considerations for the purposes of assessing environmental impacts which is the purpose of the EIR. Such discussion may be included in the SOC, if it is a reason the agency is using to support its action to approve a project despite the environmental impacts disclosed in the EIR. Please note that as cited in the comment [See PRC Section 21002; see also CEQA Guidelines Section 15092(b)(2)] overriding considerations must be identified for each significant impact to make infeasible the mitigation measures or alternatives identified in the EIR. The comment has not identified mitigation measures or alternatives to reduce Significant and Unavoidable impacts disclosed in the EIR, nor has the commenter provided substantial evidence to support the need for any new analysis or different conclusions in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 47-11

The comment provides a summary of the preceding comments contained in the comment letter. The conclusion restates the commenter's view that the Proposed Plan incentivizes commercial development over residential development and increases FAR without committing to affordable housing. The commenter requests inclusion of more project alternatives and also reserves the right to supplement their comments at future proceedings related to the Proposed Plan. Finally, the commenter requests all future notices related to the Proposed Plan and provides relevant contact information.

Please see **Responses 47-1** through **47-10**. The commenter's mailing address is included in the Interested Parties list.

LETTER NO. 48

Susan Mullins, President
Stacy Sillins, Vice President
Upper Nichols Canyon Neighborhood Association

Response 48-1

The comment includes introductory text about the Upper Nichols Canyon Neighborhood Association. The commenter prepared the comment letter because the association is concerned about the Proposed Project, and the comment letter identifies issues of concern.

The comment is an introductory comment that generally states their concern for the Proposed Project. Please refer to **Responses 48-2** through **48-10** for responses on specific concerns.

Response 48-2

The comment states that the Proposed Plan needs to address existing issues and do more extensive research before releasing an EIR, and that the Proposed Plan is being fast tracked.

The Notice of Preparation for the EIR was released on April 29, 2016 and a Scoping meeting for the EIR was held on May 17, 2016. A series of informational meetings were held in Hollywood in the summer of 2017, followed by webinars online in 2018 prior to the publication of the EIR. As stated in the Project Description on page 3-12 of the EIR, CEQA requires an EIR to compare existing physical conditions to the physical conditions after implementation of a project. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 48-3

The comment states that the impact of the high-density development envisioned for the CPA does not address the very old sewer and water system which has not been upgraded beyond repairing sections of burst pipes across Hollywood and the Hollywood Hills. The commenter further states that they have met with LADWP to address this and the regular power outages that plague the area. With regards to the power outages, the commenter says that LADWP said they do not have the "manpower" to do anything but patch the system in the hills and across the City.

Please see **Master Response No. 4 – Infrastructure** and **Master Response No. 9 – Hillsides**.

Response 48-4

The comment states that the traffic data is incomplete because it was only collected on the three quietest days of the week and during the three slowest months of the year and does not account for special events and cut-through traffic.

This comment was made before the City published the recirculated Draft EIR, Section 4.15, Transportation and Traffic. Analyzing traffic impacts during the weekday commute hours when the additional impact of new development will be greatest was found to be the most applicable analysis for the Proposed Plan. This is because the Proposed Plan will not result in any new special event activities or additional roadway closures. Therefore, analyzing traffic impacts during the weekdays when the additional impact of new development will be greatest was found to be the most applicable analysis for the Proposed Plan. The commenter does not provide any substantial evidence as to why the consideration of different days of the week or months of the year would result in different impact findings in the EIR. Please see **Master Response No. 8 – Transportation & Traffic** for additional information regarding the data collection effort. While congestion is no longer a significant impact on its own, it could be a CEQA impact if it would impede emergency access. The RDEIR analyzed impacts from congestion on emergency access and concluded that there is no direct way to correlate impact to emergency response times with congestion. So while the Proposed Plan would increase congestion it was not anticipated there would be significant impacts to emergency access from the Proposed Plan. This is because LAPD and LAFD constantly monitor average response times and adjust resources and planning accordingly to ensure that their constitutional mandate to provide life protecting services is provided. This monitoring and planning includes special events. See, e.g., RDEIR at page 4.15-56 discussing LAFD deploying specialized medical units, including using medics on bicycles during special events. Therefore, doing additional congestion monitoring for special events and use of Hollywood Bowl and other large attractions in the Plan Area would not change the conclusions of the EIR analysis. The EIR discloses that the Proposed Plan will generally exacerbate traffic delay in the Plan Area. This will also be true during special events, such as the Oscars, or use of Hollywood Bowl or Ford Theater, among others listed by commenters. But LAFD and LAPD, along with LADOT and the EMD, will continue to address the demands created from increased congestion. Therefore, the impact from special event traffic, including as exacerbated by the Proposed Plan, on response times and emergency access is less than significant. No additional analysis is needed.

Response 48-5

This comment raises concerns about how residents would evacuate, and how emergency services would respond in the event of an emergency under the increased density of the Proposed Plan given the current gridlock on the streets and key exit points. The comment also states that since Nichols Canyon has just been re-designated as a high fire area, new insurance policies are no longer being written by the five major California insurers, and it is unclear what is happening with policy renewals.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. In October 2019, Section 4.15 was recirculated to address the new guidelines for transportation metrics under CEQA in response to SB 743, which resulted in the City adopting significance thresholds with vehicle miles traveled to replace the former level of service metric. Impact 4.15-4 concluded that the Proposed Plan would have a less than significant impact on inadequate emergency access. See pages 4.15-45 to 4.15-60 of the recirculated Section 4.15, which discusses emergency access. Please also see **Master Response No. 5 – Emergency Services**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 48-6

This comment asks what is the projected increase in "manpower" and the cost for expanded fire and police services as a result of the Proposed Plan. The commenter also states that the entertainment zone is taking officers from other areas of Hollywood and the Hollywood Hills to respond to this one small part of Hollywood.

As discussed under Impacts 4.14-1 and 4.14-2 in Section 14.4, Public Services, of the EIR, the LAFD and LAPD maintain acceptable service levels through the provision of additional personnel and equipment in conformance with their existing policies, procedures and practices. LAFD has a mandate to protect public safety and must respond to changing circumstances and, therefore, would act to maintain response times.

Similarly, to ensure that necessary police services, facilities, and equipment are provided for the public safety needs of all neighborhoods, demand for police services and facilities is monitored and forecasted by LAPD in order to maintain standards. It is possible that over the 20-year plan horizon, the reasonably expected development from the Proposed Plan could result in the need for and construction of new or expanded police and fire facilities. However, no new facilities are planned or proposed in the Proposed Plan, and it is assumed that if new or expanded facilities are determined to be necessary at some point in the future, such facilities would occur where allowed under the designated land use. The comments do not raise issues or provide substantial evidence supporting a need to change the EIR conclusion or analysis.

Response 48-7

The comment states that proposed high rises and tourism seem to have been prioritized over housing for locals in recent years and there is a need to balance housing needs.

The comment does not identify or raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The Proposed Plan's primary objectives, as stated in the Project Description, includes accommodating population, housing, and employment growth, which includes planning for increases to the housing supply and providing a range of employment opportunities, including expansion of Hollywood's media, entertainment, and tourism industry. Please also refer to the CPC-2016-1450-CPU Staff Report for additional information. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 48-8

The comment states that there is a disconnect between who needs housing and the rents in the new buildings, concern about new units being used for short term rentals, and asks what the income levels is for "affordable" units.

Please see **Master Response No. 6 - Displacement and Affordable Housing** and **Master Response No. 1 – General Comments and Non-CEQA Issues**.

For clarification, the City of Los Angeles, affordable housing is generally housing for Extremely Low, Very Low, and Lower Income persons or families (households). The income levels are based on the household (adjusted for household size), and whether the income level is within a set percentage below the Area Median Income (AMI). The AMI is the estimate of median income in the Los Angeles – Long Beach Primary Metropolitan Statistical Area that is determined periodically by the US Department of Housing and Urban Development (HUD). Extremely Low Income is 30 percent of AMI, Very Low Income is 50 percent of AMI, and Low Income is 80 percent of AMI.

Response 48-9

The comment states that open space in the hillsides is important and do not support the opening of paper streets for further development. The commenter states support for paper streets being developed as exit routes for emergencies or to lessen the pressure of the other canyon roads.

Policy LU2.4 encourages exploration of connecting secondary access networks for emergency access and public safety when considering an application for hillside subdivisions, as well as extensions, completions, and connections of existing street networks. Hillside subdivisions are subject to the review procedures outlined in LAMC Section 17.00. A paper street is a street that has been impassable for vehicular travel for a period of five consecutive years and for which no public money was expended for maintenance during that period (Ref. Sec. 8331 California Code, Streets and Highways Code). A new policy (Policy PR3.4) has been added to address future rezoning of paper streets for open space easements, along with implementation program P136 to identify and map paper streets in the hillsides.

The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 48-10

The comment notes that the EIR conflates private open space with public open space and provides a conclusion that includes reinforcing the need of more public open space such as pocket parks, playgrounds, fields, and community gardens.

Under CEQA, the loss of open space is not expressly an environmental impact. Open space is not analyzed as park space or recreational facilities. Section 4.14, Public Services, analyzed impacts to parks from the Proposed Plan. Private open space is considered to an extent it reduces demands on parks and recreational facilities. (See e.g., Draft EIR page 4.14-52 [LAMC Section 12.21 (G) establishes open space requirements for residential projects] and **Chapter 4.0, Corrections and Additions,** for page 4.14-50.) Open space would be considered part of the existing environment under aesthetics impacts.

As discussed in Section 4.1, Aesthetics, the EIR considered the Proposed Plan's impacts on scenic vistas and scenic resources, for which the EIR concluded a less than significant impact.

Section 4.14 -Public Services discusses that the Proposed Plan could increase demand for recreational and park facilities, which could result in substantial or accelerated physical deterioration of parks and recreational facilities given the existing deficits for smaller parks in the Community Plan Area. The EIR also found that while the Griffith Park provides a surplus of regional park space in the Plan Area that can serve hikers and other recreational activities, it does not provide for "some types of recreation typically found in pocket, neighborhood, and community parks and therefore, the deficit in these smaller parks could be significant." (Draft EIR page 4.14-51) The EIR concluded that the impact related to parks would be significant and avoidable. The Quimby Act requires developers of residential projects (except affordable housing units and second dwelling units) to dedicate land for park and recreation purposes, or pay a fee in lieu thereof, prior to obtaining a permit. The EIR indicates that even with compliance with the Quimby requirements, future cumulative development under the Proposed Plan would exacerbate the already significant impact. No feasible mitigation was identified that could minimize the significant impacts related to recreation and park facilities due to the unavailability of adequate land at reasonable costs. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 49

Gary Benjamin, Principal
Alchemy Planning + Land Use
4470 West Sunset Boulevard, Suite 547
Los Angeles, CA 90027

Response 49-1

The comment describes property located at 3842-3852 West Roble Vista Drive and states the economic adverse impact the Proposed Plan would have on the property. The comment also states to review the letter provided by Mr. Benjamin, which concludes that the Plan Update would be a taking of the property.

The responses below address the commenter's specific comments on the Proposed Project.

Response 49-2

The comment requests a proposed land use designation change for a hillside area (Subarea 79). The comment also requests deletion of proposed land use Policy LU1.4, which would limit density on lots with average natural slopes in excess of 15 percent to the Minimum Residential land use density. The comment states the

proposed change for Subarea 79 would significantly reduce the density allowed on the properties. The comment acknowledges the current inconsistency between the land use designation and the zoning of Subarea 79, but suggests it would be more appropriate to change the land use designation. The comment states that Land Use Policy LU1.4 would have a substantial impact on the future use and improvement of the site and surrounding properties by reducing the allowable residential density, and provides a conclusion statement summarizing the proposed requests.

Please see the CPC-2016-1450-CPU Staff Report to review proposed changes to land use designations and zoning. The existing 1988 Hollywood Community Plan states that "it is the intent of this Plan that all natural slopes generally in excess of 15 percent be limited to the minimum density range." The Hollywood Community Plan Update clarifies this existing language through mandated Policy LU1.4 as indicated in the Final EIR Updated **Appendix D** (Draft Hollywood Community Plan). The policy states: Notwithstanding any land use designation to the contrary, all projects on properties designated under a Single Family land use designation (Minimum, Very Low II, Low I, or Low II) with average natural slopes in excess of 15 percent shall be limited to the Minimum Residential General Plan land use designation (i.e. Minimum Density housing category of one dwelling unit per 40,000 square feet of lot area) for the purpose of enforcing the slope density formula in 17.05C (Tentative Tract Maps), and 17.50E (Parcel Maps). This same language is also stated on the General Plan Land Use Map Footnote 1. The Proposed Plan's slope density policy is consistent with the primary objectives as outlined in Section 3.5 of the EIR. To the extent the comment concludes that the Proposed Plan is in conflict with Housing Element policies for housing or is internally inconsistent with housing policies, the comment does not provide substantial evidence to support those conclusions. The Proposed Plan is intended to accommodate anticipated growth in the City consistent with Framework Element policies and SB 375 to put development near transit, in regional centers and along transit corridors and protect neighborhoods and the hillsides. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 50

Yoni Chriqui
EdenRock
1601 Vine Street, 6th Floor
Los Angeles, CA 90028

Response 50-1

The comment requests the removal of two properties, located at 1743 and 1747 North Hudson Avenue, from the historical resources maps in Section 4.5 of the EIR. The comment states that the two properties are not resources because 1743 Hudson has sustained extensive fire damage and 1747 Hudson was not found to be a historic resource, according to the attached assessment prepared by a historic resource consultant.

This comment requests a modification to a Historic Resources Survey Certified by the California Office of Historic Preservation. Any request to modify or re-evaluate a historic resources survey should be directed to the responsible local authority. The structures on each of these properties, which included the one-story building at 1743 North Hudson Avenue that the commentator noted sustained extensive fire damage and the duplex located at 1747 North Hudson Avenue have both been demolished. Based on a search on the Department of Building and Safety's website for building permits, demolition permits for both structures were finalized in 2019.

LETTER NO. 51

Orrin M. Feldman, Esq.
2733 Woodstock Road
Los Angeles, CA 90046

Response 51-1

The comment includes introductory text, including of the Hollywood Hills West Neighborhood Council (HHWNC), identifies the boundaries of the HHWNC area, and identifies the types of land use that is located within the HHWNC area.

No further response is required. Please refer to **Responses 51-2** through **51-17** for responses on specific concerns.

Response 51-2

The comment states a general criticism that the Proposed Plan and EIR do not identify existing issues in the Hollywood CPA and therefore do not provide good planning for the future as the Proposed Plan does not address existing problems in the CPA.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 51-3

The comment states that the zoning requests for Sunset Boulevard by the Spaulding Square and Sunset Square HPOZ areas do not seem to have been updated.

A number of zone changes were updated for Sunset Boulevard in this area to primarily address height limits. Please refer to the proposed zoning in The Final EIR Updated **Appendix C**, Proposed Change Area Map and Change Matrix, and the Staff Report and Exhibits for CPC-2016-1450-CPU for more information. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 51-4

The comment asks how the zoning reference in the Community Plan Update and EIR would work once re:code LA is applied.

Refer to **Response 46-**1.

Response 51-5

The comment states that the EIR needs to include more detailed analysis and proposals to improve infrastructure, sanitation, traffic, affordable housing, noise, and public safety within the CPA. The comment reiterates that there are existing problems related to these listed issues and the EIR does not accurately capture these existing problems.

The comment provides general assertions but does not identify any specific deficiency or provide any substantial evidence to support that different analysis should have been prepared or a different conclusion be reached in the EIR. No further response is required. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**. Further detail related to infrastructure, emergency services, and affordable housing is provided in **Master Response No. 4 – Infrastructure, Master Response No. 5 – Emergency Services**, and **Master Response No. 6 – Displacement and Affordable Housing**.

Response 51-6

The comment states that the Hollywood Community Plan Update and EIR should include suggestions to provide more parking in the regional commercial core area.

As stated on page 4.15-39 of the recirculated Section 4.15, Transportation and Traffic of the EIR, parking deficits are considered to be socioeconomic effects, rather than impacts on the physical environment as defined by CEQA, but there may be secondary physical environmental impacts. According to SB 743, parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area is not considered a significant impact; the majority of the Project Area is within a transit priority area. Please refer to policies for parking management in Chapter 6: Mobility and Connectivity of the Community Plan. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 51-7

The comment states that the existing congestion and transportation issues are not mentioned or analyzed in the EIR. The comment also states that the effect of special event traffic operations and road closures is not sufficiently analyzed. The comment states that WAZE has increased congestion on local streets; DASH service has helped but needs to be expanded; and suggests that a comprehensive traffic study is needed to measure existing problems.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to compy with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Section 4.15 describes the existing traffic operations and congestion levels in the Plan Area (pages 4.15-9 through 4.15-18) and Tables 4.15-11 and 4.15-12 show the AM and PM peak period roadway operations with the Plan under Treatment Options 1 and 2. Please also see **Master Response No. 8 – Transportation & Traffic**.

Responses 51-8 to 51-10

The comment states concern about the zoning and the use of TOC incentives along the Sunset Boulevard corridor between La Brea Avenue and Crescent Heights/City of West Hollywood border. The comment states that the zoning on Sunset Boulevard allows a variety of heights and intensity, and suggests that this difference should be improved under the Plan Update. The comment states that the zoning, height limit, and FAR for Sunset Boulevard heading west from Fairfax Avenue should be reduced. The comment expresses concern that the City's zoning code incentivizes the construction of new hotels over new residential units in the R4 areas. The comment states that residents are being displaced. The comment suggests that the Planning Department should limit the availability of conditional use permits for hotels in R4 areas and that the conditional use permits should be appealable to City Council.

The base zoning of the subject Sunset Boulevard corridor has been updated for greater consistency, and this area is included in the Hollywood CPIO District, which has an affordable housing incentive program that replaces the TOC incentives in this area. The CPIO prohibits new hotel development in the Multi-family Residential subareas included in the CPIO District. Under the Proposed Plan, hotels are not eligible for development incentives and are further regulated through the Hollywood CPIO. The CPIO prohibits hotel development in the Multi-family Residential subareas and requires a Conditional Use Permit for hotels in the Regional Center subareas that would remove any existing residential units. Please refer to the CPC-2016-1450-CPU Staff Report and Exhibits. On March 18, the City Planning Commission recommended approval of the Hollywood Community Update and made a few recommended changes, including more robust FAR and density incentives for affordable housing within the Regional Center of the CPIO and the allowance of a two-story height incentive along height-restricted commercial corridors in the CPIO. Please see the Final EIR

Updated **Appendix E** – Proposed CPIO, which incorporates the changes recommended by the CPC. Please also see **Master Response No. 6 - Displacement and Affordable Housing** and **Master Response No. 1 – General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 51-11

The comment states that the Draft Community Plan has errors and omissions such as Figure 2-1 showing The Laugh Factory as a cultural facility but so is the Woman's Club of Hollywood.

Figure 2-1 has been updated to include the Woman's Club of Hollywood; please see the Community Plan.

Response 51-12

The comment states that Policy LU2.4 seems to suggest that paper streets would be turned into real streets to promote hillside development, which is undesirable because the hillsides are high fire danger zones and increasing development in hillside areas will increase fire danger(s). The comment states that the Proposed Plan should not promote secondary access in the hillsides except to address public safety concerns. The comment also states that the hillsides are more widespread than contemplated by HCPU2 and the EIR, and both Spaulding Square and Sunset Square are located on hillsides.

Please refer to **Response 48-9**.

Response 51-13

The comment states that rooftop commercial uses generate noise that affects residents up to 1,000 feet from the noise source. The comment goes on to identify Mulholland Design Guideline 37 and PR3.10 in the Hollywood Community Plan stating that rooftop uses should be discouraged or banned by the Proposed Plan to preserve local residents' rights to quiet enjoyment. As noted by the comment, rooftop noise may be audible at distances up to 1,000 feet but that does not necessarily constitute a significant impact. The EIR identified operational stationary sources, such as rooftop bars as a source of potentially significant impacts and identified mitigation measure N3 to reduce impacts (Draft EIR p. 4.12-23). Mitigation Measure **N3** requires a noise study for discretionary projects within 500 feet of noise sensitive uses that include sources of exterior noise, which would include rooftop uses. All necessary mitigation would be identified and applied to reduce rooftop use noise levels. The commenter's statements of noise experienced by rooftop uses in the Plan Area does not support the need for additional analysis or a different impact conclusion. See **Response 27-8** for a further discussion of rooftop noise.

Response 51-14

The comment states that the Franklin Corridor Study Area from La Brea Avenue to Vine Street is not well explained in the Draft Community Plan text and should be explained.

The previous reference to the Franklin Corridor Study Area in the Community Plan has been removed. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Response 51-15

The comment states that additional parks should be added to page 4-9 of the Community Plan, which identifies a list of parks in the Hollywood Community Plan Area. The comment also states that the City Planning Department is exercising authority to treat private open space as public open space. The comment states that public open space is needed and counting private open space towards a developer's obligation to

provide open space cuts down on the amount of public open space. The comment states that only public open space should be counted towards a proposed project's open space requirement.

The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The Community Plan policy document shows park sites in the CPA in Figure 4-2 , and the names of the parks are listed on page 4-8 of the Community Plan. The larger park sites, such as Griffith Park and Runyon Canyon Park, are identified by name in Figure 4-2 and are not listed on page 4-8.

The policy document supports public open space. As provided in the Final EIR Updated **Appendix D**, the Community Plan has goals and policies supporting both open space and public space in Chapter 4: Public Realm, Parks, and Open Space. Policies in the Community Plan encourage projects to provide privately-owned space that is accessible to the public, such as Policy PR2.2.

Developers may provide open space as part of their development projects, and sometimes it is a requirement. For example, private open space is required for certain residential development projects. LAMC Section 12.21.G.1 requires developers to provide usable open space for projects with six or more residential units for the purpose of providing recreation to apartment dwellers and safer play areas for children as an alternative to surrounding streets, calculated by the number of habitable rooms contained within each unit. Usable open space may consist of private and/or common area. This type of open space may include private balconies or private recreational areas, such as swimming pools or gyms. The open space that is required to be provided is for private use by the residents.

Other times, developers may choose to provide publicly accessible open space, which is aligned with the Community Plan's goals and policies. The Hollywood CPIO supports having open space that is accessible to the public as a community benefit and has a Publicly Accessible Outdoor Amenity Space incentive for future non-residential development in the CPIO Regional Center subareas. Please see the Hollywood CPIO in the Final EIR Updated **Appendix E** and the Staff Report for CPC-2016-1450-CPU.

See Master Response No. 1 - General Comments and Non-CEQA Issues. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 51-16

The comment states that Figure 6-3 in the Draft Community Plan shows bicycle lanes on Cahuenga Boulevard in the Cahuenga Pass but is not referred to in the text.

Figure 6-3 displays the bicycle enhanced network of the citywide Mobility Plan 2035 within the Hollywood Community Plan Area, and as stated the map is provided for reference purposes only. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 51-17

The comment provides a conclusion statement suggesting that the Plan Update and EIR should establish a good framework for future development and to provide more details and better and clearer rules. The comment states there should be more specific language to address the many issues and concerns.

Specific proposed land use and zoning regulations, including Qualified Conditions of Approval and Development Limitations, are provided in the Final EIR Updated **Appendix C**, Proposed Change Areas Map and Change Matrix, and also the Staff Report and Exhibits for CPC-2016-1450-CPU. Please also refer to the Final EIR Updated **Appendix D**, Proposed CPIO, for more information. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 52

Mr. & Mrs. Jim Geoghan
Whitley Heights
Los Angeles, CA 90028

Response 52-1

The comment notes that the area around Whitley Avenue near the Whitley Heights HPOZ has three different zones, and the one most compatible is RD3-1XL. The comment requests RD3-1XL zoning.

The zoning of this area has been partially revised to RD3-1XL and is identified as Subarea 2:2. Please refer to the CPC-2016-1450-CPU Staff Report and Exhibits. Some portions remain [Q]R4-1VL because this zone reflects the mid-scale apartment buildings that are built in this area. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 53

Edward Villareal Hunt, AIA, ASLA, President
The Melrose Hill Neighborhood Association
4928 West Melrose Hill
Los Angeles, CA 90029

Responses 53-1 and 53-2

The comment states that one of the two main priorities for the Melrose Hill HPOZ expansion area is the 36 remaining parcels in the area bounded by Marathon, Oxford, Lemon Grove, and Hobart. The comment states that second main priority for the Melrose Hill HPOZ expansion is the concentration of "Courts" in the area. The comment requests that the two main priorities be included in the Community Plan and to include a proposed boundary of the expansion area.

The Community Plan has a future implementation program, P31, to study the historical resources surrounding the existing Melrose Hill HPOZ and a general placeholder note on Figure 1-4 of the Community Plan regarding the expansion study area. The proposed boundary will need to be determined by additional study of the area. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 54

Edward Villareal Hunt, AIA, ASLA, President
The Melrose Hill Neighborhood Association
4928 West Melrose Hill
Los Angeles, CA 90029

Response 54-1

This comment asks for clarification on the proposed roadway width of Melrose Avenue, if it is being reduced to 56 feet on Figure 6-1 of the Draft Community Plan.

As indicated in Section 4.15, Transportation and Traffic on page 4.15-6, information on street standards can be found in the Mobility Plan 2035. Figure 6-1 delineates the Community Plan Area's street network. Melrose Avenue, as contained within the Community Plan Area, has several street designations, including

mostly Avenue II and Avenue II Modified. The road-bed is commonly 56 feet for a standard Avenue II, as stated on page 6-4 of the Draft Community Plan. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

LETTER NO. 55

J.H. McQuiston, P.E.
McQuiston Associates
6212 Yucca Street
Los Angeles, CA 90028

Response 55-1

The comment states that the EIR does not analyze the interaction between the CPA and other Community Plans.

The EIR provides an analysis of environmental impacts related to the Proposed Plan, which encompasses the Hollywood CPA. For the most part, the analysis of environmental impacts is restricted to the affected geography, namely the Hollywood CPA though there are environmental resource areas that require a regional approach to analysis such as Section 4.3, Air Quality and Section 4.15, Transportation and Traffic. See Chapter 4.0, Environmental Analysis, for more detailed information and analysis. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 55-2

The comment states that the EIR does not recognize the Santa Monica Fault as a public safety threat.

Table 4.6-1 on page 4.6-5 of the EIR lists 21 different active faults in Southern California, including the Santa Monica Fault, which may affect the CPA through associated seismic activity. The EIR also identifies the Hollywood fault including its geographic extent within the CPA and identifies the fault zone as an Alquist-Priolo Earthquake Fault Zone. Figure 4.6-1 of the EIR provides a map of the geographic extent of the various active faults within a two-mile radius of the CPA, and the Santa Monica Fault is shown on the map. As discussed on pages 4.6-16 and 4.6-17 of the EIR, the seismic activity and associated risks in Southern California are acknowledged; however, as discussed on page 4.6-16 of the EIR, California Supreme Court ruling in *CBIA v. BAAQMD*, which held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project unless the project exacerbates the existing condition. The potential for substantial adverse effects on people or structures from strong seismic ground shaking from earthquakes would generally not be an impact under CEQA unless it results from the project exacerbating the existing environmental condition. Future development under the Proposed Plan would not exacerbate existing seismic conditions in the Project Area. Therefore, as stated in Section 4.6, Geology and Soils, on pages 4.6-15 and 4.6-16, the Proposed Plan would have ***no impacts*** related to strong seismic ground shaking.

Response 55-3

The comment states that bus travel is not a preferred mode of transportation for people shopping for perishable goods.

The Proposed Plan seeks to encourage development in areas served by transit but does not prohibit personal automobile use. This comment provides the commenter's opinion and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 55-4

The comment states that the EIR does not consider reasonable build-out density and claims that the City is ignoring the effects of haphazard development.

Please see Section 3.7, Proposed Plan Reasonably Expected Development, on pages 3.15 and 3.16 of the EIR for discussion on the reasonably expected development under the Proposed Plan, the underlying assumptions used to determine the level of development, and the strategies employed in developing the Proposed Plan; also, see Appendix B, Methodology. This comment provides the commenter's opinion and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR or provide substantial evidence supporting different analysis is required or conclusion in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 55-5

The comment states that the Proposed Plan does not protect City easements from destruction.

Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment is vague, and does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 55-6

The comment states that the EIR does not include a mobility system that allows visitors and pass-through traffic to be accommodated by roadway widening, new streets, and increased off-street parking.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 55-7

The comment states that the EIR does not have evidence to support its conclusions.

This comment provides the commenter's opinion and does not raise any new significant environmental issues or provide substantial evidence supporting the commenter's opinion of the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 55-8

The comment states that the EIR does not provide a reasonable jobs-housing ratio analysis.

There is no requirement within CEQA to evaluate a jobs-housing ratio. Population, housing and employment impacts are discussed in EIR section 4.13 Population, Housing and Employment. Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 55-9

The comment states that the EIR does not discuss the mandated 5-acre parks by the City's Plan.

The EIR discusses the demand for different types of park sizes using recreational ratios identified in the City's Public Recreation Plan, in Section 4.14, Public Services, of the EIR, on pages 4.14-50 and 4.14-51. Please refer to Table 4.14-18 on page 4.14-51. As concluded under Impact 4.14-4, the conclusion is significant and unavoidable as to deterioration of existing parks with the implementation of the Proposed Plan and less than significant related to providing new recreational and park facilities. The comment does not raise any new significant environmental issues. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 55-10

The comment states that the EIR does not conform to an overarching transportation goal that states Los Angeles pedestrians will walk only 400 feet or less on City sidewalks.

Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 55-11

The comment states that the EIR falsely declares the Project to be the Hollywood Community Plan (a segment of the General Plan) to avoid complying with stricter Government Code requirements.

This comment provides the commenter's opinion and does not raise any new significant environmental issues or provide substantial evidence supporting the commenter's opinion of the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

For clarification, the Project was adequately described in Chapters 1, 2 and 3 of the EIR per CEQA Guidelines Sections 15124, 15378(a)(1); and California Code of Regulations [CCR] Title 4, Chapter 14, Sections 15000-15387. Other citations were also provided throughout the EIR to ensure compliance with applicable CEQA Guidelines and state code requirements.

LETTER NO. 56

Danielle Mead

Response 56-1

The comment includes introductory text and states that because the Plan will provide direction for the growth of Hollywood for the next 20 years, the Plan's impacts must be fully captured, analyzed, and mitigated to the greatest extent possible.

The comment suggests how the plan's impacts must be addressed and does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. No further response is required. Please refer to **Responses 56-2** through **56-30** for responses on specific concerns.

Response 56-2

The comment states that the project location description should include the City of West Hollywood as a southern boundary along Fountain Avenue. The project location description should also include foothills, not just hills and flatlands.

Refer to **Response 27-2** for discussion on project description regarding hillsides, hills, mountains, and foothills.

Response 56-3

The comment states that the description of existing land uses is inaccurate. Specifying that multi-family housing is located east of La Brea Avenue, along Hollywood Boulevard, Vine Street, Highland Avenue, Sunset Boulevard east of Highland Avenue, Santa Monica Boulevard, and south of Franklin Avenue between Highland Avenue and Cahuenga Boulevard; and that single family homes are also located in the foothills and flatlands. The commenter believes that HPOZs should be mentioned in the existing land use discussion.

Refer to **Response 27-2** for land use discussion the geographic locations mentioned in the commenter's letter and also regarding HPOZs.

Response 56-4

The comment states that the proposed treatment option for La Brea Avenue between Sunset Boulevard and Hollywood Boulevard in Table 3-11 is not possible with the development that has already occurred in the section.

Refer to **Response 27-2** for discussion on proposed treatment option.

Response 56-5

The comment states that page 4.1-22 of Section 4.1, Aesthetics, of the EIR should include "skyline palms" because the commenter believes that these types of palm trees are a unique feature to the Project Area and should be protected.

Refer to **Response 27-3** for discussion regarding palm trees and skyline.

Response 56-6

The comment states that the analysis for the West Region in Impact 4.1-3 does not account for TOCs, which could allow taller development. The comment asserts that the EIR does not discuss or mitigate for taller structures associated with TOCs. The comment asserts that the less-than-significant impact on visual character is not correct because of the TOC impacts on the Proposed Plan's increased FAR and height limits.

Refer to **Response 27-3** for discussion regarding TOC, potential heights, and visual character.

Response 56-7

The comment states that the cumulative impacts discussion on visual character does not mention TOCs, which the commenter believes would have a cumulative impact on density and height.

Refer to **Response 27-3** for discussion regarding visual character and cumulative impacts.

Response 56-8

The comment states that odors from sewers are a problem observed in the foothills and flats between La Brea Avenue and Fairfax Avenue and that development posed by the plan will increase sewage and associated odors.

Refer to **Response 27-4** for discussion on air quality, hydrology and water quality.

Response 56-9

The comment states that page 13 of the Biological Resources section does not mention the high levels of wildlife west of US-101 in the western Hollywood Hills and that much wildlife movement occurs across streets connecting Hollywood to the Valley. The commenter expresses an opinion that too much development along streets, such as Sunset Boulevard, Hollywood Boulevard, and Franklin Avenue could impact wildlife movement and urban habitats for wildlife. The comment also states that the EIR does not reference the motion passed by Los Angeles PLUM Committee in April 2016 to create a wildlife corridor in the eastern area of the Santa Monica Mountains (between I-405 and US-101) and the City's subsequent Wildlife Pilot Study.

Please see **Master Response No. 7 – Biological Resources**.

Response 56-10

The commenter expresses its opinion that the discussion of Impact 4.4 should be amended to include mitigations for the Hollywood Hills west of US-101.

Please see **Master Response 7 – Biological Resources**.

Response 56-11

The comment states that the lack of mitigation to address impacts on historic resources is unacceptable. The comment does not suggest additional mitigation measures, does not include substantial evidence as to why the mitigation measures are unacceptable, nor does it raise specific concerns about the mitigation measures included in the EIR.

The comment will be provided to the City Council for its consideration on the Proposed Plan. Any proposed mitigation to address impacts to historical resources would require additional staff resources to create and implement. As discussed in **Master Response No. 3**, the City has numerous existing regulations to address impacts to historical resources and is adding additional measures to the CPIO. The City finds that additional mitigation measures are infeasible as a policy matter based on needed resources and impact to desirable housing and other types of development.

Response 56-12

The comment states that the Sunset Square HPOZ has been adopted; therefore, remove it from the Program table list.

The Sunset Square HPOZ has been deleted as an implementation program from the Community Plan. Please refer to **Chapter 4.0, Corrections and Additions**, for Table 4.5-3 on page 4.5-45 of the EIR. The comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR.

Response 56-13

The comment states that Transit Oriented Communities regulations and Opportunity Zones should be included in the regulatory framework of Section 4.10, Land Use and Planning.

Refer to **Response 27-7** for discussion on Transit Oriented Communities.

Opportunity Zones are census tracts designated by state and federal governments targeted for economic development that qualify for tax relief. More information is also available on the State of California's website: https://opzones.ca.gov/. Frequently Asked Questions about Opportunity Zones as they relate to Los Angeles are found at the following website: http://ewddlacity.com/index.php/opportunity-zones-in-la/frequently-asked-questions

Response 56-14

The commenter requests the same corrections as those requested for Section 3.2 as described in their letter and there is overlap with the topics covered in **Responses 56-2** to **56-4**.

Refer to **Response 27-2**.

Response 56-15

The comment states that the Proposed Plan is in conflict with Objective 3.7 of the General Plan Framework Element because the EIR states that infrastructure and public services improvements would be built as needed rather than included in the Proposed Plan as the commenter suggests the General Plan requires. The comment also states that the Proposed Plan does not include development standards for enhancing neighborhood character in areas outside the CPIO. Similarly, the comment also states that the Proposed Plan is inconsistent with the General Plan because it does not plan for new recreational facilities but the EIR discloses potentially significant impacts related to increased use of existing recreational facilities with no mitigation measures.

Refer to **Response 27-7** for discussion on consistency with the General Plan Framework and General Plan guidance, including neighborhood character throughout the CPA. Pedestrian-oriented design regulations and/or other neighborhood compatibility use regulations are being applied to new projects in applicable subareas both inside the CPIO and outside of it. See the Staff Report and Exhibits for CPC-2016-1450-CPU.

Response 56-16

This comment refers to rooftop noise from residential and mixed-use development and states that the EIR does not evaluate how far noise travels.

Refer to **Response 27-8** regarding discussion Noise analysis.

Response 56-17

The comment requests a mitigation measure to limit/prohibit roof decks within 500 feet of residential or noise sensitive uses.

Refer to **Response 27-8** for discussion on EIR Noise analysis and impact conclusion. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 56-18

The comment states that the EIR does not assess cumulative noise.

Refer to **Response 27-8** regarding discussion on cumulative noise, which is analyzed in the EIR pages 4.12-27 to 4.12-29.

Response 56-19

The comment states that Section 4.13 should include the same updates or revisions as those requested for Section 3.2.

Refer to **Response 27-9**.

Response 56-20

The comment states that the EIR should not conclude that the Plan's impacts would be less than significant since the Alternatives presented in Chapter 5.0, Alternatives have less of an impact than those disclosed for the Proposed Plan.

Refer to **Response 27-9**.

Response 56-21

This comment states that the Fire Department incident response time is outdated (2016) and expresses concern about Fire Station No. 41 which serves the hillsides. The comment states the increased growth along the Sunset Boulevard corridor will have an impact on response time and this should be analyzed for mitigation. The commenter notes that while CEQA does not require analysis of impacts related to deficiencies in service, the Proposed Plan should at least discuss what impacts might occur and provide programs to address them.

This comment was received prior to the recirculated Section 4.15 Transportation and Traffic. In October 2019, Section 4.15 was recirculated to address the new guidelines for transportation metrics under CEQA in response to SB 743, which resulted in the City adopting significance thresholds with vehicle miles traveled to replace the former level of service metric.

Response times for fire stations in the CPA were provided in the recirculated Section 4.15 in multiple tables using the most recent published data available from LAFD, which were for the months of January through August 2019 at that time. See Table 4.15-13: LAFD Non-EMS Average Operational Response Times; Table 4.15-14: LAFD Structure Fire Average Operational Response Times; Table 4.15-15: LAFD Emergency Medical Services Average Operational Response Times; and Table 4.15-16: LAFD Advanced Life Support Average Operational Response Times. Operational Response Time is defined as the time interval that starts when first contact is made, either through 911 or the fire dispatch center, and ends when the first Standard Unit arrives on scene; a Standard Unit has the capacity or equipment to administer the full suite of lifesaving services. LAFD makes response times public on its website through the interactive FireStatLA mapping platform, please visit https://www.lafd.org/fsla/stations-map. See pages 4.15-45 to 4.15-60 of the recirculated Section 4.15, which discusses emergency access, including how LAFD leadership holds regular FireStat meetings to review response time throughout the City and exercises performance management to adjust practices, methods or identify other solutions to maintain response times. Impact 4.15-4 concluded that the Proposed Plan would have a less than significant impact on inadequate emergency access. Please also see **Master Response No. 5 – Emergency Services**.

Response 56-22

This comment states that the EIR fails to account for tourists and population increase from events in the Hollywood CPA noting that tourists and local non-Hollywood residents visiting the Hollywood area also require police services, and this should be considered in the analysis.

Please see **Master Response No. 5 – Emergency Services**.

Response 56-23

The comment states that Section 4.15, Transportation and Traffic should include the same updates or revisions as those requested in comments 56-2 through 56-4, 56-13 through 56-15, and 56-19 through 56-20.

Refer to **Response 27-2**.

Response 56-24

The comment states that Figure 4.15-1 misidentified Fairfax Avenue between Fountain and Hollywood as Avenue I, but it is actually Avenue II. The comment also states the map is incorrect and outdated.

The portion of Fairfax Avenue between Fountain Avenue and Hollywood Boulevard is Avenue II, and it was corrected in Figure 4.15-1 in the recirculated Section 4.15, Transportation and Traffic. The same subject portion of Fairfax Avenue is also correctly identified as Avenue II on the Proposed Circulation Map in Exhibit E of the CPC-2016-1450-CPU Staff Report. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR.

Response 56-25

The comment states that the traffic data is outdated because it was only collected on a Tuesday, Wednesday, and Thursday, which does not reflect traffic conditions when street closures are most likely to occur for special events, and that special events in Hollywood occur on any day, every day, night and day, and year round. The comment further states that traffic conditions cannot be considered mitigated without the correct and complete data.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 56-26

The comment indicates that Figure 4.15-4 should be updated to show Sunset Boulevard west of La Brea to city border as four lanes with restricted parking during peak hours and that Hollywood Boulevard also appears to be incorrect in that area.

Refer to **Response 27-14**.

Response 56-27

The comment states that the John Anson Ford Theatres should be included in the description of special events and that the year-round events at the Hollywood Bowl should be acknowledged. The comment also states that impacts due to filming and other street closures should be included in the special event description.

Please see **Response 27-15**.

Response 56-28

The comment states that the proposed treatment option for La Brea Avenue between Sunset Boulevard and Hollywood Boulevard is not possible with the development that has already occurred.

Refer to Response **27-2**.

Response 56-29

The comment states that Impact 4.15-2 is not mitigated due to the inaccurate description of special events.

Refer to **Response 27-17**.

Response 56-30

The comment states that Figure 4.15-8 and Figure 4.15-9 have Crescent Heights mislabeled as Fairfax.

Refer to **Response 27-18**.

LETTER NO. 57

Christine Mills O'Brien
2811 Westshire Drive
Hollywoodland, CA 90068

Responses 57-1 and 57-2

The comment discusses the history of Hollywoodland, the "Gifted Park," and the development of the Hollywoodland Specific Plan, which became effective in 1992. The comment also describes existing problems in the area that have occurred in recent years that have affected the environment, such as trails and flora being damaged by visitors to the area. The comment reports that the four identified properties have had potential problems with zoning, such as possibly exceeding the allowable size, a lack of maintenance of the area, and issues related to the use of one property as leasing to a drug treatment facility and issues related to short-term rentals at the other three properties. The comment states that enforcement is not occurring.

For clarification, drug and alcohol treatment facilities, which are also known as sober living homes, serve six or fewer persons in a single-family dwelling unit. These facilities are subject to State Health and Safety code, including Division 2 Licensing Provisions, and Division 10.5 Alcohol and Drug Programs and LAMC Sections 12.07 and 12.08 that outline uses permitted in residential single-family zones. Under State and Federal law the City is preempted from prohibiting these facilities for individuals who fall under the Americans with Disabilities Act.

Short-term rentals that comply with the City's recently adopted Ordinance No. 185931 regarding home-sharing are allowed. The recently adopted ordinance is effective as of July 1, 2019. For inquiries on zoning compliance, please contact LADBS. LADBS includes a Code Enforcement unit, which can be reached at (213) 473-3231; the website is ladbs.org/services/core-services/code-enforcement. Additionally, LADBS includes a Building Records unit where the history of permits and records can be searched. The phone number for the records units is (213) 482-6899. An online search of permits and records can be accessed at this website: https://www.ladbsservices2.lacity.org/OnlineServices/

The comment refers to the existing physical environment and does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 57-3

The comment expresses that the City has made Hollywoodland an unauthorized entry into the park for visitors seeking to view the Hollywood sign and requests that the residential community be restored to what it was before 2001. The comment provides a list of 32 negative conditions to address, including restrictions, enforcement, and also lists restoration suggestions such as the restoration of historic walls, historic granite entry gates, bridle paths, native plantings, and the use of the Lake Hollywood Park as a neighborhood park. The comment also states concerns about wildlife documentation and environmental damage resulting from the promotion of the Hollywoodland Gifted Park area in communications materials but to recognize the donation of the approximately 440-acre area to the City about 75 years ago.

The comments about the park's conditions refer to the existing physical environment and does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the

EIR. These comments will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Regarding comments about wildlife, the EIR identifies significant adverse impacts to biological resources and mitigation measures to reduce those impacts. The County of Los Angeles designates SEAs, not the City. Residential areas are not typically identified as SEAs because of substantial human activity. Please also see **Master Response No. 7 – Biological Resources** for discussion of wildlife and habitat issues in the hillside areas and **Master Response No. 9 – Hillsides**. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-4

The comment requests an update of the Hollywoodland Specific Plan, which was implemented in 1992. The comment requests updates to the Specific Plan on various topics, including land use, parking, wildlife, and energy conservation. The comment also provides a timeline of key events and problems that have occurred in Hollywoodland dating between 1923 and 2017.

The Community Plan includes an implementation work program, P2, that would maintain the Hollywoodland Specific Plan along with other hillside areas in order to carry out Policy LU2.1, which is to preserve stable single-family zoned residential neighborhoods. An update of the Hollywoodland Specific Plan is a full work program that requires authorization and initiation from the City Council as to provide funding for a plan update that would generally require city planning staffing and CEQA review, a public participation process, and coordination.

The comment refers to the existing physical environment and does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Please also see **Master Response No. 7 - Biological Resources** regarding wildlife and biological resources.

Response 57-5

The comment states that the Lake Hollywood Park area was part of the Gifted Park area given to the City and that showing an image of the Hollywood sign misrepresents the area. The comment states that the purpose of the Lake Hollywood Park was to serve the immediate community, not tourists. The comment states the parking in that area is limited and the streets are substandard. The comment also states that there are two "bootlegged vistas" adjacent to the park, and to encourage the retention of this area as residential and not for recreational/commercial zoning.

Lake Hollywood Park is one of the City's public parks in the Hollywood Community Plan Area, where people can see views of the Hollywood sign. The Proposed Plan maintains the Open Space land use designation and the Open Space zoning of this park. The immediate surrounding area near the park is zoned for single-family residential use and the Proposed Plan maintains the zoning. The comment refers to the existing physical environment and does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-6

The comment refers to scenic vistas in the EIR and states there are no official vistas in Hollywoodland but there are "bootlegged" sites and the public is coming to the area despite it being a residential area with substandard streets in a very high fire hazard severity zone. The comment states that visitors are standing on private residential property to see the Hollywood sign and private properties should be protected.

As stated in Section 4.1, Aesthetics, of the EIR, on page 4.1-7, the City's General Plan Conservation Element defines scenic views or vistas as the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views is typically from parklands, publicly-owned sites, and public rights-of-way. The EIR identifies two designated overlooks - Jerome C. Daniel Overlook and the Universal City Overlook - where panoramic views are possible, and also mentions other locations, such as Dante's View in Griffith Park, Barnsdall Art Park, and some public rights-of-way and public trails throughout the Plan Area. Available public viewing locations of the prominent Hollywood Sign vary throughout the Project Area, including intermittent views from the flatlands, from higher elevations such as trails, freeways and other areas that extend beyond the Community Plan Area. As concluded in Section 4.1, Aesthetics, of the EIR, the Proposed Plan would result in less-than-significant impact on scenic vistas. The comment refers to the existing physical environment and does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-7

The comment states that the conclusion impact for Impact 4.1-3, regarding visual character, should be "yes" instead of the less than significant impact conclusion. The comment states that visual character is being compromised in part because of the "hodge podge piecemeal design" seen in high-rise buildings. The comment suggests that all projects should be expected to have articulation, color balance, and attractive landscaping.

The comment does not provide substantial evidence for the impact concluded by the commenter. As concluded in Section 4.1, Aesthetics, of the EIR, based on the analysis contained therein, the Proposed Plan would result in less-than-significant impact on visual character. The existing Community Plan Area is an urban built environment with a vast amount of open space and hills at its northern extent. There is an existing mix of uses, building types and heights, and design features from different time periods that contribute to the overall visual character of Hollywood. As listed in the Final EIR Updated **Appendix C**, the Draft Community Plan include design policies in Chapters 3, 4, and 5 and the Final EIR Updated **Appendix D** includes standards in the CPIO. Additional development standards were later added to the Hollywood CPIO; see the CPC-2016-1450-CPU Staff Report and Exhibits. The City also has Citywide Design Guidelines, adopted in 2019, that focuses on three design approaches: Pedestrian First Design, 360 Degree Design, and Climate-Adapted Design. As stated on page 4.1-27, the analysis of impacts to visual character is subjective and the qualities that create aesthetic value vary from person to person. Please also see **Master Response No. 9 – Hillsides**. The comment refers to the existing physical environment and provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-8

The comment asserts that the Proposed Plan would create a new source of substantial light or glare that could adversely affect daytime or nighttime views in the Project Area. The comment states that studies should be conducted from various hillside neighborhoods to confirm this impact and provide ways to reduce the impact.

The EIR concludes a less than significant impact for lighting and a less than significant impact with mitigation for glare; see pages 4.1-40 to 4.1-41 of the EIR. As discussed on page 4.1-40 to page 4.1-41, it is reasonably anticipated that illumination from new development (e.g. security lighting, parking lot lighting, ornamental lighting, pedestrian scale lights, lighting from ground floor storefronts and signs) within portions of the Plan Area would increase illumination; projects of substantial scale would introduce lighting in areas where currently lighting levels are low; and additional sources of nighttime lighting can be anticipated.

However, the increased illumination would be subject to the Los Angeles Municipal Code, which contains specific regulations with respect to lighting. As a result, the Proposed Plan would have a less-than-significant impact on lighting.

With regards to glare, starting on page 4.1-41, the EIR states that it is possible that some development could be constructed with highly reflective materials and larger buildings with extensive glazing could cause discomfort or have disruptive impacts from glare. The implementation of Mitigation Measure **AE-1**, which limits the use of reflective materials for new construction on a building that requires site plan review, would reduce impacts to less than significant levels.

The commenter does not provide substantial evidence as to how light and glare with implementation of the Proposed Plan with required mitigation would be substantially different from existing conditions. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)). See also **Master Response No. 9 – Hillsides**.

Response 57-9

The comment asserts that new high-rise structures that have been built are bright and glaring, particularly from bright or flashing signs and billboard lights. The comment states that these structures have intrusive glare that destroys the light balance observed from the hillside neighborhoods.

As discussed on pages 4.1-40 to 4.1-41 of the EIR, it is reasonably anticipated that illumination from new development, which includes new signs, within portions of the Plan Area would increase illumination; projects of substantial scale would introduce lighting in areas where currently lighting levels are low; and additional sources of nighttime lighting can be anticipated. However, the increased illumination would be subject to the Los Angeles Municipal Code, which contains specific regulations with respect to lighting. As a result, the Proposed Plan would have a less-than-significant impact on lighting. As noted on page 4.1-26 of the EIR, a portion of the CPA is within the Hollywood Signage Supplemental Use District (SUD), which allows additional signage within the SUD boundaries, so there could be higher illumination within the SUD than in other parts of the CPA However, the SUD requires that illuminated signs are located or screened so as to minimize direct light sources onto any exterior wall of a residential unit, and into a window of a commercial building. Additionally, externally lit signs are required to be shielded from public view. The EIR concludes a less than significant impact for lighting and a less than significant impact with mitigation for glare; see pages 4.1-40 to 4.1-41 of the EIR. The mitigation measure for glare impacts would require new projects that are subject to site plan review to submit plans that specify the exterior building materials to the Department of City Planning and the Department of Building and Safety for review. Any glass used as part of the external façade of buildings shall be no more reflective than necessary to comply with the Green Building Code or other state or local UV requirements.

Refer to **Response 57-8**.

Response 57-10

The comment states that videos, photos, and eyewitness summaries provide wildlife data that refutes the discussion under Impact 4.4-1 without identifying any specific analysis or evidence in the EIR that the commenter considers to be refuted. The commenter expresses the opinion that the City should protect the Hollywoodland gifted park land and install camera traps, as well as create a nature preserve.

Please see **Master Response No. 7 – Biological Resources**.

The discussion of wildlife in the EIR is generally consistent with the commenter's statement. As discussed on page 4.4-7 and 4.4-16, suitable habitat for wildlife is generally found in undeveloped natural open space areas, the majority of which is within or near the Santa Monica Mountains. The developed portions of the

Santa Monica Mountains can also provide food and shelter for wildlife found in the area. See **Chapter 4.0, Corrections and Additions**, for page 4.4-16 for clarifications that are added to the EIR analysis.

The Proposed Plan does not propose changes to Open Space-designated parcels, except to correct the land use designation and zoning of these parcels to reflect its existing use. The Hollywoodland Gifted Park is a public park owned by the City of Los Angeles, and the Proposed Plan retains the Open Space designation on the "Hollywoodland Gifted Park" area.

The suggestions to protect Hollywoodland Gifted Park, install camera traps, and create a natural preserve in the Plan Area are actions that could be taken as appropriate at the project-level based on project-specific analyses to mitigate project-specific significant impacts (see Mitigation Measure **BR-1**). The comment addresses the existing physical environment and does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. Also see **Response 57-11** for discussion on Hollywoodland containing undisturbed open space with residential uses that might be inhospitable to species sensitive to human activity. Also see **Response 57-12** for discussion on the Federal Endangered Species Act and Habitat Conservation Plans (HCP).

The Biological Resources section of the EIR (pages 4.4-15 thru 4.4-26) presents an adequate analysis of the effects and impact conclusions of the Proposed Plan for each impact question, and also identified mitigation measures accordingly (a summary of mitigation measures can also be found in Chapter 2.0, Summary starting on page 2-7). The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

See also **Master Response No. 9 - Hillsides** explaining why the Proposed Plan will not induce, incentivize or cause development in the hillsides.

Response 57-11

The comment states that the SEA figure should include the Hollywoodland residential community and its surrounding open space parkland as an SEA. The comment indicates that there are verifiable animal cross corridors that traverse from open space to residential areas.

SEAs are officially designated areas within Los Angeles County with irreplaceable biological resources. SEAs contain critical habitats or sensitive natural communities for special status species, which are species that are or should be listed as rare, threatened, or endangered by CDFW or USFW. As explained in the EIR, Section 4.4, Biological Resources (page 4.4-4), the City identifies SEAs as important for the preservation and maintenance of biodiversity, and Los Angeles County defines SEAs as ecologically important land and water systems that support valuable habitat for plants and animals, and are often integral to the preservation of rare, threatened or endangered species and the conservation of biological diversity in the County. The County has not identified Hollywoodland as an SEA and, thus, Hollywoodland is not shown in Figure 4.4-1 as a SEA. Although Hollywoodland contains undisturbed open space areas and natural vegetation, the area also contains residential uses with ornamental landscaping. While the developed portions of Hollywoodland provide food and shelter for wildlife found in the area, these developments and the ornamental landscaping associated with these developments are not critical habitats for sensitive species. Additionally, these developments may be inhospitable to those species that are sensitive to human activity and habitat disturbance.

The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 57-12

The commenter expresses the opinion that Hollywoodland and its surrounding parkland should be considered a designated nature preserve area.

Designated under the Endangered Species Act Section 10(a)(1)(B), Habitat Conservation Plans (HCP) are federal planning documents that are required as part of an application for an incidental take permit when a project will affect a listed and non-listed species (e.g., species that are candidates or have been proposed for listing). An HCP details how impacts on a species will be minimized or mitigated, and how the HCP is to be funded. While the commenter asserts that Hollywoodland and its surrounding parkland should be designated as a nature preserve area, it does not contain an HCP or biological conditions that would warrant a nature preserve, as designated by the Endangered Species Act.

This suggestion is outside the purview of CEQA and does not address the potential impacts that could occur with implementation of the Proposed Plan. This comment will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-13

The commenter expresses the opinion that Hollywoodland is a SEA because it is surrounded by open space and animal corridors traverse through the residential area; and also suggests that this sensitive area should be "put in" [identified] as a nature preserve. The commenter also states that the City in failing to maintain certain public facilities is destroying the ecology of Hollywoodland Gifted Park Section. The commenter provides a picture of what appears to be a partial mud and debris slide that the commenter claims was the responsibility of the City's Recreation and Park Department maintenance failure.

Refer to **Responses 57-11** and **57-12**. The suggestion to put Hollywoodland in a preserve is outside the purview of CEQA and does not address the potentially impacts that could occur with implementation of the Proposed Plan. The picture and comments asserting the City is destroying portions of Griffith Park are not supported with evidence and do not to support that the Proposed Plan will result in a significant impact different than those identified in the EIR. This comment will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Also, see **Master Response No. 9 – Hillsides**.

Response 57-14

The comment states that the footnote on page 4.4-16 regarding the *Draft Griffith Park Wildlife Management Plan*, prepared by Cooper Ecological Monitoring, Inc., is out-of-date and should be updated. The comment asserts that a biologist should be hired to document the environmental decline.

The comment refers to citation number 12 on page 4.4-16, which is one of the resources cited to answer impact question 4.4-1. The Draft Griffith Park Wildlife Management Plan was prepared on April 10, 2008. The second source, citation number 13, refers to the California Department of Fish and Wildlife Database and the stamp date on this database is from November 2016. Citing the best available sources available at the time of writing the EIR is consistent with CEQA. While the commenter notes that the *Draft Griffith Park Wildlife Management Plan* should be updated, the document helps to identify the types of wildlife that have been found in Griffith Park.

The commenter further adds that a biologist should be hired by City Recreation and Parks and the Department of City Planning to document the suggested environmental decline in this area.

The suggesition to hire a biologist is a suggestion that requires a separate process contingent on budgetary and city council action. This suggestion is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan

The EIR includes mitigation that would require applicants of discretionary projects that are in or within 200 feet of Griffith Park or in areas that are required to comply with the City's Baseline Hillside Ordinance to prepare a biological resources assessment report, which would specify and provide more recent documentation of the biological resources found on individual development sites; see Mitigation Measure **BR-1** on pages 4.4-24 and 4.4-25. Project-specific biological resources assessment reports would identify the presence or absence of sensitive species on the individual development sites and appropriate project specific measures would be required to address potential impacts. See also **Master Response No. 9 - Hillsides**.

Response 57-15

This comment states that residents are concerned about the probability of a sweeping wildfire and emergency response in the event of a wildland fire and the potential for the Plan to physically interfere with an emergency response plan or emergency evacuation plan. The comment mentions the fire that occurred in 1961 and states that the population, density and the promotion of the Hollywoodland area as an unauthorized place to see the Hollywood sign has created a disaster waiting to happen.

The comment raises issues related to existing conditions that attract visitors to the Hollywoodland area and does not speak to the Proposed Plan. The Proposed Plan includes no actions or policies that would directly or indirectly attract or incentivize tourist activities or visitor activities to the Hollywoodland area. Moreover, for clarification, the Proposed Plan does not include increases in zoning in the Hollywoodland area, see the Staff Report and Exhibits for CPC-2016-1450-CPU. Additionally, the comment does not provide substantial evidence of an increased risk of fire related to the conditions the commenter identifies or that the Proposed Plan exacerbates those conditions. Please see **Master Response No. 5 – Emergency Services** and **Master Response No. 9 – Hillsides** for more information.

Response 57-16

This comment states that residents are concerned about wildland fires and mentions the fire that occurred in 1961.

Refer **to 57-15**.

Response 57-17

The comment states that the EIR should not make assumptions as to whether wildlife uses the bridge over US-101 near the Hollywood Reservoir. The comment suggests that a biologist should be hired and a camera trap program should be initiated to verify the assumption.

The EIR provides adequate discussion and analysis to make reasonable assumptions on Wildlife Movement in the CPA supported by evidence (the subsection on WILDLIFE MOVEMENT starts on page 4.4-13 of the EIR). Under CEQA Guidelines Section 15384 (b): *"Substantial evidence" includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."* Hence this guideline allows for the lead agency the discretion to make assumptions based on expert opinion supported by facts. The lead agency cited academic sources which are informed by expert opinions supported by facts.

The academic sources cited are based on expert opinion, and they are listed on the bottom of page 4.4-13, see citation numbers 8, 9, and 10. These citations are studies that reasonably support the idea that "…wildlife use natural areas as well as bridges and concrete channels of the Los Angeles River to connect to the Tujunga Valley and Hansen DAM SEA and the San Gabriel Mountains." Because the 101 freeway bisects the Santa Monica Mountains within the Project Area, the discussion in the EIR reasonably assumes that some wildlife might use bridges to connect to other sensitive ecological areas supportive of wildlife habitat.

Please see **Master Response No. 7 – Biological Resources**.

Response 57-18

The comment states that open space and a vineyard in the Hollywood Hills was ignored in the farmland analysis of the EIR.

Open space is not considered farmland for the purposes of analyzing impacts related to conversion of farmland to non-agricultural use. The open space areas of the Hollywood Hills are discussed in Section 4.10, Land Use and Planning of the EIR. Only land that is designated as "Prime Farmland," "Farmland of Statewide Importance," "Unique Farmland," "Farmland of Local Importance," or "Grazing Land" by the California Department of Conservation, Division of Land Resource Protection is considered when assessing impacts related to farmland conversion. The vineyard identified in the comment is currently zoned and designated for residential use and is not listed in the California Farmland Mapping and Monitoring Program. Further, the Proposed Plan does not propose changes to the vineyard or underlying zoning, or otherwise propose physical changes to the vineyard use that would be considered a conversion of farmland. The commenter does not provide substantial evidence that the impact discussion related to farmlands in the EIR is inadequate and thus no further response is required. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 57-19

The comment references the analysis in the EIR related to Habitat Conservation Plans and states that numerous development projects have occurred in Griffith Park which has affected habitat stating these developments are illegal.

Please see **Master Response No. 7 – Biological Resources** for discussion of the Griffith Park SEA. Regarding the commenter's concerns about "bootlegged" development, the commenter does not provide substantial evidence that the impact discussion related to biological resources in the EIR is inadequate and thus no further response is required. Commenter has also not provided substantial evidence to support the claims related to how wildlife have been affected by alleged activities in Griffith Park. Commenter is also raising concerns about existing conditions without identifying how the Proposed Plan will exacerbate those conditions. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**.

Response 57-20

The comment suggests that a wildlife preserve should be created in the Hollywoodland Gifted Park area.

Refer to **Response 57-12**.

Response 57-21

The comment states that Mitigation Measure **BR-1** should have a set of criteria for it to be effective and it should not be a one-time measurement. The comment states that dialogues with neighborhoods should occur to understand what and how the measurements should occur because wildlife has different patterns. The comment asserts that benchmarks need to be established to obtain meaningful comparative data.

The project-specific biological resources assessments that would be required by Mitigation Measure **BR-1** must be conducted by a qualified biologist who understands that wildlife have different patterns of movement at different times of the day and year. The assessments would record the plant and wildlife species encountered during a site visit as well as literature research to determine the possibility of occurrence. This assessment would be subject to the biologist determination about the proper scope of the research and site visit to make such a determination. The assessment would determine whether existing conditions on the site provide suitable habitat for sensitive species, even if species are not encountered during the site visit. Based on this information, the biologist conducting the assessment would determine the potential for a sensitive species to occur on an individual development site, including during any construction

activities. If the potential for specific sensitive species is identified on an individual site, then the Lead Agency, Trustee Agency or the project biologist may require that protocol surveys be undertaken. Such surveys must adhere to specific temporal requirements and frequencies to determine presence or absence of a species. If sensitive species are identified as potentially impacted by a project, specific measures will be required as appropriate with may include payment of fees, preservation of habitat elsewhere, relocation of plants and/or animals, collection of seedlings, etc.

Response 57-22

The comment states that existing drainage infrastructure in the Hollywoodland Gifted Park portion of the CPA is not adequately maintained, citing a recent lawsuit involving a Hollywoodland property owner.

Regarding the commenter's concerns about maintenance, the commenter has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**.

Response 57-23

The comment indicates that the Proposed Plan would conflict with any applicable habitat conservation plan (HCP) and natural community conservation plan (NCCP).

As discussed in Section 4.4, Biological Resources, of the EIR, no HCP or NCCP are located within or near the Project Area. While Griffith Park is an SEA, it is not part of an HCP or NCCP. The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 57-24

The comment provides a statement related to existing noise levels increasing over the last five years due to high-rise structures and freeway noise. No comment is provided related to the adequacy of the analysis provided in the EIR.

Please see **Response 27-8** for discussion of reflective noise and noise at distance receivers. For additional context, ambient noise levels have likely increased over the last five years due to growth throughout the City and in the CPA. Notably, Caltrans traffic counts indicate that freeway volumes at Sunset/Hollywood Boulevards have increased from a 2012 range of 189,000 to 209,000 to a 2017 range of 196,000 to 217,000 (http://www.dot.ca.gov/trafficops/census/). The commenter's address is located approximately 1.2 miles from the freeway, 1.35 miles from Hollywood Boulevard, and 1.6 miles from Sunset Boulevard. Cumulative regional traffic growth is more likely the cause of noise increases than reflection off buildings located more than 1.2 miles from the subject property.

Response 57-25

The comment indicates that there is a helipad atop Mount Lee where hazardous materials (e.g., fuel) is stored which is cause for safety concerns. The comment also states that helicopter use in the area creates a noise impact to residents in Hollywoodland as well as for wildlife and that mitigation or other measures should be put in place to address limit or restrict use of helicopters and other aircraft in the area. The comment also requests restriction of the private roadway leading up to Mount Lee.

Impact 4.12-6 is a question related to projects located within a vicinity of a private airstrip and noise exposure to residents and/or people working in such a vicinity. Mount Lee is not a designated private airstrip as discussed on page 4.12-27 of the EIR. The comment outlines observations on the existing conditions related to their opinions about possible hazardous use of this site and they are mainly suggesting mitigation

criteria to restore habitat; and offering suggestions to prohibit airspace use, and restrictions for the private roadway.

For clarification, there is no helipad that is maintained for public or private use on top of Mount Lee. There is a paved or concrete area related to the communication tower that is occasionally used by State, County, or City fire and rescue services for emergency purposes.

The occasional and intermittent noise attributed to helicopters providing emergency services is needed to protect life and property and is not considered a significant impact due to the inherent temporary nature of these activities.

Aircraft noise is regulated by the Federal Aviation Administration. The City is not able to change helicopter activities or prevent their use from occurring in federally regulated airspace. No component of the Proposed Plan encourages helicopter tours. The Proposed Plan would not change the existing environmental condition related to helicopters and associated noise. The City encourages residents to direct noise complaints to the Federal Aviation Administration at http://heli-noise-la.com/.

Related to safety issues, the comment speculates about safety risks from activities related to helicopters in the area which is an existing conditions. The commenter does not provide substantial evidence to support that there is an existing risk or that the Proposed Plan will exacerbate those existing conditions such that a safety issue related to the use by helicopters and associated activities will result. No further analysis or response is necessary.

Response 57-26

This comment states that the Proposed Plan would result in impacts to existing parks and recreational facilities as they suggest that more people equate to more environmental abuse. The commenter points to a 20-space parking lot at the end of Beachwood Drive and a vista viewing site at Mulholland Drive and Canyon Lake Drive as examples of projects that have caused more traffic and pedestrians to this neighborhood. The comment also notes that there are no openings into the park from residential Hollywoodland.

Consistent with the comment, the EIR discloses a significant and unavoidable impact related to increased use of public recreational facilities. The comment has not identified a different potential impact posed by the Proposed Plan than that identified in the EIR and thus the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 57-27

The comment states that the Plan applies incorrect street width designations without acknowledging the unusual dead-end street configurations in the Hollywoodland portion of CPA. The comment also states that Hollywood sign-related tourism is resulting in traffic intrusion as well as impacts on the SEA and VSHFZ.

This comment was made before the City recirculated Section 4.15, Transportation and Traffic, which used the new 2019 thresholds of significant related to traffic as required by SB 743. No transportation impacts were identified in the recirculated Section 4.15 for the Proposed Plan. Neighborhood Intrusion impacts are not a significant impact under the City's thresholds of significance. Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street, which is within the Hollywoodland portion of the CPA. In addition to this portion of Beachwood Drive, the only other street redesignation included in the Proposed Plan is a portion of Curson Avenue between Fountain Avenue and Curson Place. No additional changes to street designations are proposed.

Response 57-28

The comment states that helicopter activity surrounding the Hollywood sign is a problem.

As cited in their comment letter, the comment is referring to Impact Question 4.15-5 "Would implementation of the Proposed Plan result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?"

The intent of this impact question is meant to analyze foreseeable impacts resulting in a change in air traffic patterns in the context of an airport. The EIR adequately answered the question and disclosed that the closest airport outside the CPA boundary is Bob Hope Airport in the City Burbank which is approximately 5 miles away; and LAX which is approximately 11 miles away.

The commenter is referring to an existing condition or activity, and has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 57-29

The comment states that illegal trails related to the Hollywood sign do not conform to existing land use policies and suggests that this issue has not been corrected because the City seeks to promote the area for hikers and tourism.

The commenter has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 57-30

The comment states that because of the substandard streets in Hollywoodland, construction activities in the area create unsafe conditions. The comment also states that hiking paths must be controlled to avoid creating more pathways and erosion.

Please see **Master Response No. 9 – Hillsides**. Regarding illegal hiking trails, the commenter has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues posed by the Proposed Plan. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**. This comment was made before recirculated Impact Section 4.15, Transportation and Traffic, was released. Please see RDEIR Section 4.15 for impact analysis for emergency access and safety hazards which found less than significant impacts.

Response 57-31

The comment states that adequate maintenance of storm drains is needed to avoid landslides. The commenter also identified development of drainage situations, which the commenter is concerned will result in safety issues.

The commenter has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues posed by the Proposed Plan. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues** and **Master Response No. 9 – Hillsides**.

Response 57-32

The comment provides photographs of what the commenter says shows a park area, an illegal fence and illegal digging that occurred above 6100 Linforth Drive in a recognized water course. The comment also

states that the EIR fails to identify the presence of kangaroo rat, rabbits, and cranes. In addition, the comment says that lighting in the hills is very different due to elevation changes and location of streetlights. The comment also states that there is no mention of Hollywoodland's historic core.

To the extent that the commenter has evidence of kangaroo rats, rabbits and cranes are located in the Plan Area, they have not provided it to the City except in statements. Therefore, it cannot be confirmed that these animals have in fact been photographed in the Plan Area. Even if the commenter did provide the photographs of these animals and others in the Plan Area it would not require new analysis or impact conclusion in the EIR. The EIR recognizes that there are common as well as special status species in and around the hills in the Plan Area and that they may be impacted by the Proposed Plan. It is not feasible to do a survey of the entire Plan Area for the EIR as it would be an inefficient use of City monies and cause an unreasonable delay in completing the EIR. Additionally, it is not necessary to meet the intent of an EIR to inform the public and the decisionmakers about the potential impacts of the Proposed Plan. As discussed under Impacts 4.4-1, 4.4-2, 4.4-3, and 4.4-4 in Section 4.4, Biological Resources, most of the Project Area is developed with urban uses and does not contain or provide habitat that supports special status species. However, there are areas of the CPA that do contain special status species and habitat used by special status species, and wildlife corridors. Development in the Plan Area, in hillsides or near undeveloped land has the potential to significantly impact special status species, sensitive habitat, and wildlife corridors. Implementation of Mitigation Measures **BR-1** and **BR-2** would reduce the potential for substantial adverse effects to special status species on most development sites. However, the mitigation measures would not eliminate all potential impacts to special status species and therefore the impact remains significant after mitigation.

The comment does not raise new issues that were not analyzed in the EIR or provide substantial evidence supporting a need to change the Draft EIR conclusion or analysis. Please see **Master Response No. 7 – Biological Resources** for further discussion. Regarding illegal development and the statement about lighting in the hills, the commenter has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues posed by the Proposed Plan. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**. Also see **Master Response No. 3 – Historical Resources** and **Master Response No. 9 – Hillsides**.

Response 57-33

The comment provides statements about the need to protect single-family zoning and open space, and how the approval of accessory buildings, small lots and short-term rentals have contributed to problems. The comment states that the City is marketing residential communities as tourist accommodations and for the Olympics, which lowers property values and diminishes R-1 zoning.

Please also see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. No further response is required.

Response 57-34

The comment provides introductory text about census data, and states that the Community Plan is being developed for entities outside of Los Angeles and not necessarily the community. The comment asks about SCAG data influencing the census data. The comment includes foreign-born population statistics and the poverty level for the City of Los Angeles from the 2010 Census and states that the Plan should reflect the census data, and suggests that the Plan should anticipate possible changes in the "non-citizen" population if border controls and federal immigration laws are altered/enforced.

Please refer to Appendix B, Methodology regarding SCAG and data sources. The comment does not identify a new physical environmental impact. No further response is required.

Response 57-35

The comment states there have been increases in development, homelessness and roadway congestion since the 1988 Hollywood Community Plan Update, and new buildings look generic. The comment also states that R-1 and hillside open space should be preserved and used for hillside living; public safety and the ecosystem also need to be addressed. The comment states that the Plan needs to reflect what livability means to property owners versus non-property owners, and lists various policy language clarifications, questions, and opinions. The comment requests the removal of Beachwood Drive from maps and to identify and label the location of Canyon Drive instead. The comment also states that private property owners have experienced quality-of-life problems because visitors misuse their private space.

The Proposed Plan has policies and zoning for preserving hillside neighborhoods and hillside open space; refer to the CPC-2016-1450-CPU Staff Report and Exhibits for more information. Please also see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment refers to the existing physical environment, does not raise or identify any new significant environmental issues and provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. See also **Master Response No. 9 – Hillsides**.

Response 57-36

The comment expresses concern about the effect of Policy LU 2.4 regarding hillside secondary access and how the policy could create traffic and crime problems in hillside neighborhoods.

The policy regarding hillside secondary access has been updated and clarified to state that Policy LU 2.4 is for emergency access and to improve public safety in the hillsides; please see the Draft Community Plan in Exhibit B of the CPC-2016-1450-CPU Staff Report. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-37

The comment asks about the distinction of commercial districts and states there should be different types. The comment also asks questions about the text provided in Chapter 2: Community Background of the Draft Hollywood Community Plan and provides additional opinions or statements regarding the text provided. The comment provides questions on state legislative acts regarding housing and sustainability that have been adopted.

Different types of commercial districts under the City's Framework Element are described and displayed on page 1-10 of the Draft Hollywood Community Plan (Final EIR Updated **Appendix C**). There are a few pockets of Limited Commercial land use designation properties in the hillsides, which is the lowest commercial intensity land use designation in the Hollywood Community Plan Area. The Framework Map in Exhibit C of the Staff Report for CPC-2016-1450-CPU also identifies various types of commercial districts in the Hollywood CPA. Please also see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-38

The comment asks questions and provides opinions about background and introductory text stated in Chapter 3: Land Use & Urban Form of the Draft Community Plan. The comment also asks for definitions of words, such as quality of life, livable, and sustainable.

Please also see **Master Response No. 1 - General Comments and Non-CEQA Issues**. Use of terms such as quality of life and livable, are intended to convey the common understanding of these terms and not a specific defined concept. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-39

The comment asks for an explanation of Policy LU9.5, which encourages the daylighting of buried streams and other policies, which promote stormwater infiltration.

For clarification, the Draft Community Plan has been updated since the publication of the EIR and the policy referenced by the commenter is Policy LU11.5 in Exhibit B of the Staff Report for CPC-2016-1450-CPU. The daylighting of buried streams is to uncover and restore streams that are buried. Stormwater infiltration refers to how water is absorbed into the ground. These policies reflect Goal 11, which is Sustainable land uses, site design, and development, including paving and stormwater infiltration systems. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-40

The comment states that the goal for sustainable development (Goal LU10) in Chapter 3 of the 2018 Draft Community Plan cannot be dictated and sounds subjective, and that policies supporting the sale and cultivation of locally sourced produce also sounds subjective.

For clarification, the Draft Community Plan has been updated since the publication of the EIR and the Goal referenced by the commenter is Goal LU12 in Exhibit B of the Staff Report for CPC-2016-1450-CPU. Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. For clarification, as stated on page 1-5 of the Draft Community Plan, a goal is a statement that describes a desired future condition or "end" state. Goals are change and outcome oriented, achievable over time, although not driven by funding. A policy is a clear statement that guides a specific course of action for decision makers to achieve a desired goal. Policies may refer to existing programs or call for the establishment of new ones.

Response 57-41

The comment requests the removal of Beachwood Drive from two maps and to identify Canyon Drive instead because that is an official opening to the park (Griffith), and to add text differentiating private and public property on page 4-7 of the 2018 Draft Community Plan (Final EIR Updated **Appendix C**). The comment states that Lake Hollywood Park was meant as a neighborhood park for residents and not a tourist viewing area, and also asks how there would be access to existing resources such as Griffith Park via enhanced pedestrian and bicycle linkages along opportunity corridors as stated in the text on page 4-9 of the 2018 Draft Community Plan.

For clarification, the Draft Community Plan has been updated since the publication of the EIR; please see Exhibit B of the Staff Report for CPC-2016-1450-CPU. Policy PR3.10 on page 4-9 and 4-10 discusses access to open space. This policy states "Maintain and improve access to existing open space and new open space including walking, hiking, and equestrian trails. Maintain and improve bicycle access to open space. Support the connection of existing walking, hiking and equestrian trail segments in the Plan Area, including the Rim of the Valley trails corridor, where feasible." The policy refers to two implementation programs P61 and P62, which are stated as long-term programs on page 7-8 of the Draft Community Plan. P61 states

"Study the connection of Griffith Park trails with Elysian Park trails, when possible." P62 states "Improve pedestrian access to Barnsdall Park in East Hollywood. Encourage access from Vermont Avenue." New policies were also added to the Community Plan after the March 18, 2021 City Planning Commission. Please refer to policies PR1.20 Access to parks and trails, PR1.21 Expand Access, and M14.16 Transit to parks.

Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-42

The comment asks to clarify PR3.4 to discourage the paving of easements, and for PR3.9 access to open space, to add that access to open space should be from legal, approved access points.

For clarification, the Draft Community Plan has been updated since the publication of the EIR and the policy referenced by the commenter is PR3.5 in Exhibit B of the Staff Report for CPC-2016-1450-CPU. PR3.5 on page 4-9 of the Draft Community Plan refers to implementation program P59. Implementation Program P59, listed on page 7-7 of the Draft Community Plan is a long term program to "develop guidelines for commercial streets to encourage the landscaping of those portions of easements which extend past the required sidewalk width and are not used for necessary driveways, sidewalks and other pedestrian uses." Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-43

The comment states that Policy PR5.4 Joint use agreement is written in a vague manner and asks for clarity. The comment also states that some structures are not listed on page 5-10 of the 2018 Draft Community Plan.

For clarification, PR5.4 on page 4-11 of the Draft Community Plan presented as Exhibit B of the CPC-2016-1450-CPU Staff Report refers to Implementation Programs P63 and P137. Implementation Program P63, listed on page 7-8 of the Draft Community Plan is a long-term program to "support school-specific agreements with LAUSD, which will enable communities to jointly use schools for recreational purposes." As stated on page 5-9 of the Draft Community Plan, Hollywood has one of the highest concentrations of designated resources in Los Angeles and some are included on that page. Please also refer to the discussion of historical resources in Section 4.5, Cultural Resources, of the EIR, starting on page 4.5-12.

Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-44

The comment requests the removal of Beachwood Drive from two maps and to identify Canyon Drive instead because that is an official opening to the park (Griffith).

Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 57-45

The comment states that in the discussion about public views, the EIR does not clearly differentiate private and public property; and suggests that development adjacent to a Scenic Highway should integrate public view protection of scenic vistas, adequate landscaping, and where appropriate provide access, hiking or biking trails or a vista point or other complementary facility.

For clarification, Section 4.1, Aesthetics, of the EIR adequately described existing conditions and provided adequate analysis of scenic views and vistas. Please see pages 4.1-7 to 4.1-26 for an overview of existing settings, including photographs and footnotes that help explain a range of heights as discussed in this context. The analysis adequately discussed the impact questions regarding scenic vistas and visual character.

The comment does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan. Also, please see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 58

Tara Stephenson-Fong
3129 Durand Drive
Hollywoodland, CA 90068

Response 58-1

The comment expresses a general concern about how the Project objectives regarding preservation can be met, such as preserving low density and single-family residential neighborhoods, while meeting additional objectives of promoting expansion of Hollywood's entertainment and tourism industry.

The comment expresses a concern that does not raise or identify any new significant environmental issues or address the adequacy of the analysis included in the EIR.

For clarification, the Project's Primary and Secondary Objectives are discussed in Chapter 2.0, Summary, on page 2-2; and an explanation was provided on the Proposed Plan's Reasonably Expected Development on pages 2-2 to 2-3. As stated on page 2-2: "The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the Project Area, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of SB 375 and the SCAG 2016-2040 RTP/SCS.

As such, the Proposed Plan maximizes development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts and directs growth away from low density neighborhoods; and preserve low density neighborhoods. The proposed zoning carries out these objectives; please see the Staff Report and Exhibits for CPC-2016-1450-CPU for more information.

The responses below (see **Responses 58-3** to **58-7**) address specific comments on the Proposed Plan and the environmental analysis in the EIR. See also **Master Response No. 9 – Hillsides**.

Response 58-2

The comment states that Hollywoodland is one of the oldest planned hillside communities in the City and a Specific Plan was adopted for the community in 1992 to ensure that new development is compatible. The comment states there are challenges affecting Hollywoodland today, including tourism to see the Hollywood Sign, substandard streets, a very high fire severity zone, and limited ingress and egress. The comment also states there are examples of development in Hollywoodland that is unpermitted or inconsistent with existing zoning. The commenter expresses concern with enforcement; the comment also requests that violations be corrected and a restoration of R1 residential status in Hollywoodland.

The commenter discusses existing issues and has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues posed by the Proposed Plan.

Inquiries on permit status can be researched with the Los Angeles Department of Building and Safety (LADBS). The public can inquire about a property's Parcel Profile and research permit activity and also access customer service on the LADBS website as follows: www.ladbs.org/services/check-status/online-building-records and www.ladbs.org/our-organization/customer-services/contact-us. LADBS' telephone number listed for general or inspection inquiries is (213) 473-3231.

Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**, **Response 57-27**, **Response 57-30**, and **Master Response No. 9 – Hillsides**.

Response 58-3

The comment provides a list of 15 requested existing issues to address in Hollywoodland as part of the Proposed Plan, including a lack of code enforcement, restoration of historic walls and native plantings, access to the Hollywood Sign, limited ingress and egress, and limiting the use of the Lake Hollywood Park as a neighborhood park. The comment also states concerns about wildlife documentation, drug rehab centers in residential communities, and environmental damage resulting from the promotion of the Hollywoodland Gifted Park area in communications materials.

Refer to **Response 57-3**.

Response 58-4

The comment states that the Lake Hollywood Park area was part of the Gifted Park area given to the City and showing an image of the Hollywood sign misrepresents the Lake Hollywood Park area, which was meant to serve the immediate community, not tourists. The comment states the parking here is limited and the streets are substandard. The comment also states there are two "bootlegged vistas" in the park, and requests the City to retain this area as residential use and not for recreational/commercial zoning.

Refer to **Response 57-5**.

Response 58-5

The comment refers to scenic vistas in the EIR and states there are no official vistas in Hollywoodland but there are "bootlegged" sites and the public is coming to the area despite it being a residential area with substandard streets in a very high fire hazard severity zone. The comment states that visitors are standing on private residential property to see the Hollywood sign and private properties should be protected.

Refer to **Response 57-6**.

Response 58-6

The comment states that Hollywoodland residents are concerned about fire safety, identifying limited ingress/egress for emergency services and residents at a potential risk of loss, injury or death.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic. In October 2019, Section 4.15 was recirculated to address the new guidelines for transportation metrics under CEQA in response to SB 743, which resulted in the City adopting significance thresholds with vehicle miles traveled to replace the former level of service metric. Impact 4.15-4 concluded that the Proposed Plan would have a less than significant impact on inadequate emergency access. See pages 4.15-45 to 4.15-60 of the recirculated Section 4.15 for analysis of emergency access, and also refer to **Master Response No. 5 – Emergency Services**.

Response 58-7

The comment states that the Plan applies incorrect street width designations without acknowledging the unusual street configurations in the Hollywoodland portion of the CPA. The comment focuses on the designation of Beachwood Drive and requests removing upper Beachwood Drive from all maps included in the EIR and Proposed Plan to prevent errors in vehicular and pedestrian traffic flow calculations.

Showing or not showing a street label in the Plan is a mapping exercise and does not change the functionality of that street. Please see **Response 29-20** for a discussion on the upper portion of Beachwood Drive.

LETTER NO. 59

Alexander C. Totz

Response 59-1

The comment indicates that that the Proposed Plan and EIR does not draw attention to the fact that the Plan Area will require individual reorientations about transportation.

As stated in the Plan and EIR, the Proposed Plan is consistent with the City's Mobility Plan 2035 which reflects a comprehensive update to the Transportation Element of the City's General Plan. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 59-2

The comment is regarding the potential impacts and mitigation measures provided in the EIR and mentions the secondary impacts to parking. The comment further states that there is no additional physical capacity for more single-occupant vehicular travel in the Plan Area.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Secondary impacts resulting from parking are discussed on pages 4.15-41 through 4.15-43 of the EIR and the Proposed Plan has a variety of policies and programs related to parking. Please see **Master Response No. 8 – Transportation & Traffic**.

Response 59-3

The comment states support for additional bike infrastructure on Hollywood Boulevard and requests that an in-lieu parking program be implemented in the Regional Center. The comment also states that the Regional Center attracts much tourism and existing, untreated conditions are potentially catastrophic in the event of a major emergency. The comment also urges resolution of parking issues in the Regional Center and a re-orientation and shift of single-occupant vehicle use to other transportation choices.

The Draft Community Plan includes mobility goals and policies in Chapter 6: Mobility and Connectivity that support all mobility options, including transit, bicycling, and transportation demand management that provide alternatives to single-drive motor vehicles. Goal M.4 is "A comprehensive transit system that provides safe and efficient access to, around and from Hollywood that minimizes automobile dependence." Goal M.5 is "A safe and integrated bicycle network that provides access to transit and key destinations" and Goal M.6 is "A well-managed parking supply where parking resources are used efficiently." No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please also see **Master Response No. 5 – Emergency Services** and **Master Response No. 8 – Transportation & Traffic**.

LETTER NO. 60

Julia Mason
1601 North Sierra Bonita
Los Angeles, CA 90046

Response 60-1

The comment states that the description of the geography of the CPA is inaccurate because of boundary streets with West Hollywood and the geographic extent of the foothills.

Refer to **Response 27-2**.

Response 60-2

The comment states that the description of existing land uses is inaccurate and specifies that single-family housing is located in the "flats" south of Hollywood Boulevard and also mentions the Spaulding Square and Sunset Square HPOZs.

Refer to **Response 27-2**.

Response 60-3

The comment states that the Plan includes both public parks and private properties with restricted access as open space, and that private properties with restricted access that are not open to the public should not be included as open space in the EIR.

Open space for the purposes of evaluating land use impacts includes areas with an Open Space land use designation as described in the LAMC. The Open Space land use designation typically corresponds to Open Space zoning, which includes parks and recreation facilities and conservation or natural resource areas. The commenter has not identified a potential impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues posed by the Proposed Plan. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 60-4

The comment states that the proposed treatment option for La Brea Avenue between Sunset Boulevard and Hollywood Boulevard is not possible with the development that already occurred in the section.

Refer to **Response 27-2** regarding the comment on the treatment option for La Brea Avenue**.**

Response 60-5

The comment states that all views of the hills should be protected. The comment also states that skyline palms should be included as a scenic resource and should be protected.

As discussed on page 4.1-27 of the EIR, the aesthetics analysis of scenic vistas takes into account public scenic views, including views of and from the Santa Monica Mountains. Neither CEQA nor the City protects private views, and the loss of a private view would not be an impact for the purposes of the aesthetic analysis in the EIR. The Proposed Plan does not propose any changes that would significantly alter the scenic views of the hillsides. As discussed in the EIR, the Proposed Plan would have a less-than-significant impact on scenic vistas.

Refer to **Response 27-3** in regards to "skyline palms."

Response 60-6

The comment states that the EIR fails to acknowledge how TOC regulations will affect building heights in lower-scale areas where FAR is restricted to 1.5:1. The comment expresses concern that the conclusion for Impact 4.1-3 Visual Character is less than significant because of TOC incentives that allow for additional density, FAR, and height.

Refer to **Response 27-3**.

Response 60-7

The comment states that the analysis for the West Region in Impact 4.1-3 does not account for TOCs, which could be taller. The comment states that the cumulative impacts discussion on visual character does not mention TOCs, which the commenter believes would have a cumulative impact on density and height.

Refer to **Response 27-3**.

Response 60-8

The comment indicates that tree canopies for shade and air pollution mitigations are not mentioned and that they should be a priority in the Project Area especially in higher density areas that lack parks and open space.

The commenter is referring to Impact Question 4.3-5 related to odors as stated in their comment. Impact Question 4.3-5 states: "Would implementation of the Proposed Plan create objectionable odors affecting a substantial number of people? The EIR adequately answered this question as required by CEQA and provided discussion under Construction and Operational Odors on page 4.3-32, including citations to the SCAQMD CEQA Air Quality Handbook, and concluded that construction and operational activities associated with future development under the Proposed Plan would not cause a significant odor nuisance.

The discussion, analysis, and impact conclusions included in the Section 4.3, Air Quality, of the EIR was adequate. The commenter has not identified an impact posed by the Proposed Plan and thus the comment does not raise any new significant environmental issues posed by the Proposed Plan. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 60-9

The comment states that odors from sewers are a problem observed in the foothills and flats between La Brea Avenue and Fairfax Avenue and that additional density will increase the problem.

Refer to **Response 27-4**.

Response 60-10

The comment states that Hollywood Hills in the Plan Area contains many wildlife corridors. Light pollution, noise, traffic, and habitat loss from increased development in the Plan Areas adjacent to the wildlife corridors will impact wildilfe. The comment states that mitigation measures, such as protected wildlife corridors, habitat areas, and open space should be provided. It also states that the discussion of Impact 4.4 should be amended to include mitigations for the Hollywood Hills west of the US-101.

The Proposed Plan does not propose changes that would increase development density in the hillsides. Therefore, lighting, noise, and traffic in the hillside areas are not expected to significantly increase when compared to existing conditions. The mitigation measures identified in Section 4.4, Biological Resources, of the EIR would reduce impacts to sensitive species, sensitive habitats, riparian habitats, and wildlife corridors. Please see **Master Response No. 7 – Biological Resources**. The comment does not provide substantial evidence to support that the Proposed Plan will have direct or reasonably foreseeable direct impacts on biological resources under CEQA because of light pollution, traffic, noise, or habitat loss. The EIR identified

significant unavoidable impacts to sensitive species, habitats and wildlife corridors, related to new development in the hillsides under existing regulations not being changed by the Proposed Plan. See **Master Response No. 9 – Hillsides**. The commenter has not identified or provided evidence for the need for new analysis or different conclusion in the EIR.

Response 60-11

The comment states that the Pacific Electric Red Car line track footprints should be protected as historical and cultural resources. The comment also states that the parcels of the former streetcar should maintain their historic footprints and specifies that the Gardner Junction, the southwest and northeast corners of Sunset Boulevard and Gardner Street should receive historic protections.

Although no response is required as it does not raise any issues related to physical environmental impacts, the following is provided for clarification: SurveyLA's Citywide Historic Context Statement for Streetcar Commercial Development defines the eligibility standards, character defining/associative features, integrity considerations, and the period of significance (1873-1934) for structures associated with neighborhood commercial development.[53] The right-of-way of the Hollywood Pacific Electric Car Route has not been identified in a SurveyLA as an Eligible Non-Parcel Historic Resource.[54] The parcels mentioned at the southwest and northeast corners of Sunset Boulevard and Gardner Street have not been found to be eligible individual historic resources in SurveyLA. Nor were they found Eligible Resources in ENV-2014-1707-EIR[55] and ENV-2016-951-MND,[56] which analyzed the environmental impact of an individual proposed project in the area. Although the specific sites identified by the commenter were not found to be eligible historic resources, SurveyLA did identify an eligible resource associated with early streetcar development north of the Gardner Junction at 1521 Gardner Street. Figure 4.5-1A to Figure 4.5-1I, a series of maps, in Section 4.5, Cultural Resources, of the EIR identifies designated resources, eligible resources, City-Designated HCMs, HPOZs and proposed areas of change under the Proposed Plan.

The Proposed Plan does not propose alterations to parcel boundaries that would result in changes to the unique parcel shapes mentioned in the comment. Please refer to **Master Response No. 1 - General Comments and Non-CEQA Issues**. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 60-12

The comment states that SurveyLA should evaluate buildings and structures along Sunset Boulevard adjacent to Spaulding Square and Sunset Square HPOZs as possible historic and cultural resources.

SurveyLA conducted surveys along Sunset Boulevard and identified a few eligible individual commercial resources between the Spaulding Square and Sunset Square HPOZs, including an office building located at 7750 Sunset Boulevard. Please see Figure 4.5-2C of the EIR. The survey findings are online: http://preservation.lacity.org/sites/default/files/Hollywood_Individual%20Resources.pdf. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

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[53] SurveyLA, *Context: Commercial Development, 1859-1980; Neighborhood Commercial Development, 1880-1980*, August 2017. http://preservation.lacity.org/sites/default/files/NeighborhoodCommercialDevelopment_1880-1980.pdf

[54] SurveyLA, *Hollywood Individual Resources,* November 2015. http://preservation.lacity.org/sites/default/files/Hollywood_Individual%20Resources.pdf

[55] ENV-2014-1707-EIR: https://planning.lacity.org/eir/7500Sunset/DEIR/files/D_IVD.pdf

[56] ENV-2016-951-MND: https://planning.lacity.org/pdiscaseinfo/CaseId/MjA3MDM00

Response 60-13

The comment states that demand on City resources and project delay are not reasons to not provide mitigations for Impact 4.5-1.

Please see **Master Response No. 3 – Historic Resources**.

Response 60-14

The comment requests clarification on how the Spaulding Square and Sunset Square HPOZs will be protected from the impact of intensified development on adjacent streets.

The Proposed Plan does not change any existing HPOZ or amend the regulations in the LAMC for HPOZs. The Spaulding Square and Sunset Square HPOZs are a part of the existing zoning and the Proposed Plan does not included changes to these HPOZs, they will remain. Under the LAMC requirements, all permits and entitlements for a project in an HPOZ are required to obtain a Certificate of Compatibility or Certificate of Appropriateness prior to project approval. Projects outside an HPOZ that are discretionary are required to analyze impacts to the HPOZ under CEQA. For clarification, the areas adjacent Sunset Boulevards that are West of La Brea mostly include new height limits, especially those pockets immediately adjacent to HPOZs. Please see the Final EIR Updated **Appendix C**, Proposed Change Area Map and Change Matrix and Updated **Appendix E**, Proposed CPIO for more information on project review procedures for eligible and designated resources. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 60-15

The comment states that TOC should be included in the regulatory framework of Section 4.10, Land Use and Planning.

Refer to **Response 27-7**.

Response 60-16

The comment states that the description of existing land uses is inaccurate and specifies that single-family housing (Spaulding Square and Sunset Square HPOZs) is located in the "flats" south of Hollywood Boulevard.

Refer to **Response 27-2**.

Response 60-17

The comment states that the Plan does not identify housing increases from Accessory Dwelling Units, and this type of development would increase the housing stock without the need for upzoning.

Please see **Master Response No. 2 – Population, Housing and Employment**.

Response 60-18

This comment states that the residential neighborhoods and HPOZs along Sunset Boulevard west of La Brea are one of the oldest residential developments in Hollywood; streets have truck weight restrictions; sidewalks are narrow; and there are no alleys. The comment requests modifications to the Proposed Q conditions, which would direct traffic away from Sunset Boulevard and onto side streets, and requests that commercial buildings provide setbacks for landscaping and tree wells. The comment also suggests that parking should be below-grade or in lots between Sunset Boulevard and the residential neighborhood to the rear of Sunset.

Modifications to the proposed zoning have been made for this portion of Sunset Boulevard; please refer to the Final EIR Updated **Appendix C**, Proposed Change Area Map and Change Matrix and the CPC Staff

Report and Exhibits for case CPC-2016-1450-CPU for more information. The comment describes existing development patterns in the area and does not identify any new physical environmental impacts from the Proposed Plan, raise any new significant environmental issues or address the adequacy of the environmental analysis in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 60-19

This comment states the Proposed Plan does not meet Objective 3.7 of the General Plan framework which says, "allow for growth in areas where there is sufficient public infrastructure and services, and the residents' quality of life can be maintained or improved." The commenter states that this conflicts with the Public Services section of the EIR which states that the Proposed Plan does not have to include infrastructure or public service improvements because they will be built as needed. The comment further questions how residential HPOZs can be protected from traffic, noise, reduction of view lines, and other impacts from proposed increased development from projects on Sunset Boulevard directly adjacent to the residential streets.

Proposed zone changes include maintaining a reduced floor area ratio, generally 1:1 FAR, and maintaining or establishing height limits of 30 feet along Sunset Boulevard adjacent to single-family residential HPOZs (Sunset Square and Spaulding Square). Please see the Staff Report and Exhibits for CPC-2016-1450-CPU and also the Final EIR Updated **Appendix C**, Proposed Change Area Map and Change Matrix. The Proposed Plan is intended to accommodate anticipated growth in the City consistent with Framework Element policies and SB 375 to put development near transit, in regional centers and along transit corridors and protect neighborhoods and the hillsides. Please see **Master Response No. 4 – Infrastructure** and **Master Response No. 8 – Transportation & Traffic**. The commenter does not provide substantial evidence to support the need for new analysis or impact conclusion related to historical resources, noise, transportation, or aesthetics, including as it relates to HPOZs.

Response 60-20

The comment is included in a series of points under the heading "Impact 4.10-2 – Conflict with other policies/regulations – General Plan Framework Elements (page 19-20)." The comment states that while the Proposed Plan includes a CPIO for the regional center, it proposes no development standards for enhancing neighborhood character in other areas of the CPA. Further, the comment suggests that specific community plans might offer standards that would protect HPOZs and other residential neighborhoods.

The Proposed Plan enhances neighborhood character with development standards implemented through proposed zone changes and goals, policies, and implementation programs in the Hollywood Community Plan. Development standards include implementing pedestrian-oriented design, contextual height limits to promote neighborhood scale compatibility, and contextual floor area ratio changes. The Hollywood CPIO generally covers central Hollywood, including the Regional Center, commercial corridors near transit, multi-family residential areas, and historic districts. Please refer to the Hollywood CPIO (Final EIR Updated **Appendix E)** for more information. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 60-21

The comment is included in a series of points under the heading "Impact 4.10-2 – Conflict with other policies/regulations – General Plan Framework Elements (pg 19-20)" and states that people need public gathering spaces but privately owned commercial development projects do not offer public access. The comment states that for Impact 4.14-4, the EIR concludes that implementation of the Proposed Plan would result in further deterioration of parks and no mitigation is provided. The comment requests that the EIR

should be corrected for Impact 4.10-2 to state that the Plan does not meet the Framework objective of creating more small parks.

Impact 4.10-2 asks if implementation of the Proposed Plan would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. The key guiding principles of the City's Framework Element and their relationship to the Proposed Plan are discussed on pages 4.10-19 to 4.10-21; specifically, the principle of creating more small parks, pedestrian districts, and public plazas is discussed on page 4.10-20 and stated below.

The Proposed Plan supports the creation of additional small parks and public plazas. Policies in the Community Plan encourage projects to provide privately-owned space that is accessible to the public, such as Policy PR2.2. This policy supports granting additional floor area bonuses for the provision of a public plaza or other publicly accessible open space and bikeway dedications along major boulevards. The Hollywood CPIO supports having open space that is accessible to the public as a community benefit and has a Publicly Accessible Outdoor Amenity Space incentive for future non-residential development in the CPIO Regional Center subareas. Please see the Hollywood CPIO and the Staff Report for CPC-2016-1450-CPU. The Proposed Plan envisions pedestrian-oriented design and walkability near transit areas and would require pedestrian-oriented design for new projects in appropriate locations, such as the Regional Center, and along commercial corridors with transit. Pedestrian-oriented scale is a key consideration of the Hollywood CPIO's development standards.

The impact analysis provided in response to impact question 4.14-4 in Section 4.14, Public Services, provides discussion on how the Proposed Plan would increase use of existing neighborhood and regional parks or other recreational facilities, and explained how the Proposed Plan impacts the physical deterioration of the facilities or accelerates the deterioration of these facilities. Further, the analysis discussion includes Table 4.14-18 to show future demand for recreational facilities in the CPA and finds that it is within reason that existing over-used neighborhood and community parks will continue to be used by existing residents as well as the new population, all of which is likely to result in further substantial physical deterioration of these facilities (see page 4.14-51 of the EIR). As stated on pages 4.14-52 to 4.14-53, the impact conclusion with respect to the deterioration of existing parks is significant and unavoidable, but the impact is less than significant with regard to impacts associated with construction of new facilities. As discussed on pages 4.14-52 and 4.14-53, Quimby Act fees are intended to be used to purchase land for parks but although there are continuous efforts to expand parkland, the costs of acquisition of land and feasibility of assembling parcels of land for recreational facilities are severe impediments. For example, the new Madison Avenue Park and Community Garden in East Hollywood recently opened in June 2019 after an eight-year effort under a partnership with The Trust for Public Land, the City, and many other community groups. Lastly, the Department of Recreation and Parks is currently seeking opportunities to expand parkland within the Community Plan area but has not yet identified specific parcels for acquisition of development.

For clarification, the Community Plan includes policies that support the creation of more parks in Chapter 4: Public Realm, Parks, and Open Space. For clarification, Chapter 4 of the Community Plan on page 4-5 includes goals and policies that support public gathering spaces and pages 4-10 to 4-11 includes goals and policies that support parks and open space opportunities, and recreational facilities for the public. Below are a few selected goals that illustrate the Plan's support of public parks and more open spaces:

- Goal PR.2 (Public Realm): Public spaces with healthy and growing urban forests that provide cleaner air, cooler streets, and serve as communal gathering places in areas of high pedestrian activity.
- Goal PR.3: New and improved open space and public parks that provide opportunities for recreation and social gathering.
- Goal PR.4: Quality public facilities that serve the community.

The comment does not provide any suggestions for additional mitigation, and is noted, and will be forwarded to the decision-makers for their consideration prior to taking any action on the Proposed Plan.

Response 60-22

The comment requests a mitigation measure to limit or prohibit rooftop decks within 500 feet of residential and other noise-sensitive uses.

Refer to **Response 27-8**.

Response 60-23

The comment states that the EIR does not assess cumulative noise.

The comment statement is incorrect. Refer to **Response 27-8**.

Response 60-24

The comment states that page 4.13-10 of Section 4.13 of the EIR should be updated to acknowledge the probable impact of Accessory Dwelling Units being planned and built on single-family lots. The comments states that ADUs will significantly increase available housing stock without the need for upzoning.

Page 4.13-10 describes the 2016 Baseline conditions and includes a summary description of housing types and locations in the Community Plan Area. Accessory Dwelling Units were included in the housing estimates. The possible development of accessory dwelling units is acknowledged under the Proposed Plan's reasonably expected development on page 4.13-15. Please also see **Master Response No. 2 – Population, Housing and Employment**.

Response 60-25

The comment states that some of the Alternatives identified in Chapter 5.0, Alternatives, of the EIR list less than significant impacts. Therefore, the comment states that the Proposed Plan's impacts should not be characterized as less than significant.

Refer to **Response 27-9**.

Response 60-26

The comment states that the data related to emergency response times is outdated because it is from 2016. The comment further states that existing response times at Fire Station 41 is already not meeting the citywide goal and claims that additional development contemplated under the Proposed Plan will further increase response times.

Refer to **Response 56-21**.

Response 60-27

The comment requests that the roadway network description be clarified to state that in the Plan Area west of La Brea Avenue, the hillside roadways are north of Sunset and Hollywood Boulevards, and states that Figure 4.15-8 and Figure 4.15-9 have Crescent Heights mislabeled as Fairfax. In addition, the comment states that increased development will impact the streets in the Plan Area.

Please see **Response 27-12** regarding the TEN on La Brea, **Response 27-18** regarding the map labeling, and **Master Response No. 8 – Transportation & Traffic**.

Response 60-28

The comment refers to the significant and unavoidable impacts identified in the EIR related to Impact 4.15-2 regarding the vehicular circulation system and Impact 4.15-3 regarding neighborhood traffic intrusion. The comment states that mitigations are needed to direct traffic away from the residential neighborhoods. In addition, the comment states that the proposed TEN treatment option for La Brea Avenue between Sunset Boulevard and Hollywood Boulevard is not possible with the development that has already occurred, and that Figure 4.15-8 and Figure 4.15-9 have Crescent Heights mislabeled as Fairfax.

This comment was received prior to the recirculated Section 4.15, Transportation and Traffic, which was updated to reflect the new CEQA Guidelines and City's adopted transportation thresholds to comply with SB 743. No significant transportation impacts would occur under the current thresholds, and therefore, no mitigation measures are required. Please see **Master Response No. 8 – Transportation & Traffic**.

Please also see **Response 27-2** regarding the TEN on La Brea, and **Response 27-18** regarding the map labeling.

LETTER NO. 61

Gregory P. Williams

Response 61-1

The comment states that the EIR prepared for the 1988 Plan did not combat environmental decline in the CPA. The comment also states that the population projections in the 1988 EIR were ignored and altered by City officials favoring new development resulting in over-building and impacts on the community related to shade, noise bounce effects, and increased traffic.

All of the commenter's views are related to existing conditions in the CPA, which the commenter claims are generated by the 1988 Plan, the associated EIR, and disregard for the information contained therein. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 61-2

The comment states that Hollywoodland's environment has been negatively impacted by the influx of visitors and past actions. The comment states that suggestions for shuttle buses and parking meters under the Dixon Plan would not lessen the impacts of people visiting the Hollywood sign, and commercial property owners in Hollywoodland would not want parking meters to impact their small businesses. The comment also states that Hollywoodland deserves the conservation of its neighborhood character and natural resources. The comment suggests that the revenue generated by the Hollywood sign should be directed to the City's Parks and Recreation to address the problems mentioned above.

The "Dixon Plan" as referenced is a comprehensive strategies report for improving park access, safety, and mobility in Griffith Park and around the Hollywood Sign prepared by the Dixon Unlimited consulting firm as an initiative under City Council District 4 in conjunction with the Mayor's Office and the Department of Recreation and Parks. The report, published in 2018, is not part of the Proposed Plan. The comment does not raise any new significant environmental issues or address the adequacy of the analysis included in the EIR. The comment is noted and will be forwarded to the decision-makers.

THERE ARE NO COMMENT LETTERS 62 TO 69.

RECIRCULATED DRAFT EIR RESPONSES

LETTER NO. 70

Ali Poosti, Division Manager
Los Angeles Bureau of Sanitation (LASAN)
Wastewater Engineering Services Division

Response 70-1

The comment states that the project description lacks sufficient detail to conduct a thorough capacity analysis because descriptions for individual proposed developments are needed to assess sewage generation, and to notify LASAN when additional information is available.

The comment is noted. The EIR appropriately provides a programmatic analysis of the Proposed Hollywood Community Plan. No individual proposed developments are proposed for the Proposed Plan. As individual developments are proposed, developers are required to contact LASAN to ensure sewer availability. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 71

Ali Poosti, Division Manager
Los Angeles Bureau of Sanitation (LASAN)
Wastewater Engineering Services Division

Response 71-1

The comment states that this letter supersedes the previous letter (Letter No. 70), and that the findings in the January 31, 2019 LASAN response letter remain valid. The comment also states to notify LASAN if additional information for environmental review becomes available.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 72

George Skarpelos, President
Jim Van Dusen, Chair, Planning and Land Use Management Committee
Certified Neighborhood Council #52
P.O. Box 3272
Los Angeles, CA 90078

Response 72-1

The comment states that the Hollywood United Neighborhood Council reaffirms its comments submitted on January 20, 2019 and supports Alternative 2: Reduced Alternative as the most viable solution to the issues raised in the RDEIR.

Please see the responses to Letter No. 28 (**Responses 28-1** through **28-10**), dated January 20, 2019. The comment supporting Alternative 2 is noted. No further response is required because the comment does not

raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 73

James O'Sullivan
FIX THE CITY

Response 73-1

The comment states that the EIR for the Proposed Plan must comply with Judge Allan Goodman's order of February 11, 2014, which is attached to the comment letter.

See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 74

Richard Howard, Executive Vice President & Chief Operating Officer
Occidental Entertainment Group Holdings, INC.
1149 North McCadden Place
Hollywood, CA 90038

Response 74-1

The comment states that Occidental Entertainment Business Trust II (OEBT II) previously submitted various zoning requests for areas affecting its properties in a comment letter dated January 29, 2019 on the EIR, but the City has generally not considered these requests except for one.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 74-2

The comment states that modern entertainment media demands and uses include a "community" where employees can live, work, and play and this requires adding residential use and more density/FAR. The comment states that the Community Plan Update continues to restrict residential development in the area that is a hub for jobs in the entertainment industry.

The comment is noted. One of the Proposed Plan's primary objectives is to provide a range of employment opportunities and promote the vitality and expansion of Hollywood's media, entertainment, and tourism industry. The Proposed Plan is preserving the industrial land use areas where studios have occupied for decades in Hollywood, and using zoning incentives to promote additional media and entertainment-related jobs. The media district generally has a Limited Industrial land use designation, which does not allow residential development, except for accessory uses, such as a unit for an on-site caretaker. The areas surrounding the media district have multiple residential zones and opportunities for multi-family residential development. The Proposed Plan envisions Subarea 41, located nearby, as an area where multi-family residential buildings can be developed close to media-related jobs. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 74-3

The comment states that the Hollywood Media District provided a detailed VMT analysis and the findings demonstrate that mixed-use developments would not cause significant VMT impacts and are likely to shorten commutes and improve the jobs-to-housing balance.

Please see **Response 75-2**.

Response 74-4

The comment states various zoning requests for properties located within land use and zoning subareas under the Proposed Plan. In summary, the commenter's requests are for additional FAR and to allow housing in industrial areas where housing is not proposed by the Proposed Plan; the properties are located in or near Subareas 16, 17:1, 40, and 40:1 in and near the media district.

Please see **Response 74-2**.

LETTER NO. 75

Alfred Fraijo Jr.
Sheppard Mullin Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071

Response 75-1

The comment states that the Hollywood Media District (HMD BID) previously submitted various zoning requests for the HMD BID area in a comment letter dated January 31, 2019 on the EIR (Exhibit A). Exhibit A also contains previously submitted Attachments A to D that were included in the comment letter dated January 31, 2019 on the EIR. The letter states that the requests include FAR increases, permission to build mixed-use residential projects and hotels, prohibition of automotive and storage uses, and updated descriptions of the HMD BID area to reflect new media uses, including creative office space and art galleries. The letter also states that additional information is being presented in this new comment letter regarding VMT.

The comment contains introductory remarks from the Hollywood Media District BID. The previously submitted comment letter from 2019 is Comment Letter No. 21 in the EIR and responses have been provided in the Final EIR. The responses below address HMD BID's specific comments in Comment Letter No. 75 on the Proposed Plan.

Response 75-2

The comment states that allowing residential uses in the Hollywood Media District would help to shorten trips, reduce VMT, and not cause VMT impacts. The comment references a Sensitivity VMT Analysis Summary prepared by the commenter's transportation consultant. The comment notes that the Hollywood Media District is almost entirely within a Transit Priority Area with frequent bus service, and that Santa Monica Boulevard is identified as a key transit corridor in the Plan and EIR. The comment also states that the Hollywood Media District area of the Plan has the largest employment growth rate but does not permit housing in most of the area.

The comment is regarding zoning changes and does not dispute the analysis or findings in the EIR. The Sensitivity VMT Analysis Summary prepared by Gibson Transportation Consultants and attached to the comment letter was reviewed and shows the benefits of housing development at several specific locations within the Hollywood Media District. The VMT Analysis Summary utilizes the City's VMT Calculator tool to estimate the VMT metrics for the example projects. In comparison to the Plan level of analysis conducted

for the EIR, the VMT Analysis Summary considers specific development projects and their effect on VMT and shows that the potential developments would have a VMT benefit. Similar to the findings in the EIR that a less than significant VMT impact would occur with the Proposed Plan (Impact 4.15-2), the sample development projects studied by the commenter also show no VMT impacts. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 75-3

The commenter hired a transportation consultant to prepare a VMT sensitivity analysis showing the benefits of housing development at several specific locations within the Hollywood Media District. The comment states that the EIR relies on macro-level analysis rather than specific projects or intersections in the Plan Area. The comment also states a hypothetical, mixed-use project with 300 dwelling units and 50,000 square feet of commercial office space at six representative intersections would not trigger a significant VMT impact because mixed-use projects generally generate fewer vehicle trips and shorter trip distances.

While the comment does not dispute the EIR analysis, it should be clarified that the travel demand model contains the primary roadways network, intersections, and transit routes in the Media District (as explained in Section 4.15 and Appendix J of the EIR) and the service population projections reflect the zoning changes and growth projections in the Plan and not only SCAG projections as noted in the comment. One of the Proposed Plan's objectives is to preserve industrial lands for media-related uses and employment given Hollywood's entertainment legacy and association with the film industry. The Community Plan Area has limited parcels that are designated Limited Industrial land use designation, which is primarily used by studios, media-related uses, and support services, such as storage. The Proposed Plan has many other areas where mixed-use or residential development near transit systems are more appropriate, such as in central Hollywood in the Regional Center. In addition, the Proposed Plan has housing development opportunities in proximity to the Media District area, such as in Subarea 41 near Paramount Pictures, which has an adopted Specific Plan to guide for the redevelopment of the studio campus property through the year 2038. That project is expected to ultimately add a net of approximately 1.4 million square feet of floor area. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 75-4

The comment states various zoning requests for properties located within land use and zoning subareas under the Proposed Plan. In summary, the commenter's requests are for additional FAR and to allow housing and hotels in industrial areas where these uses are not proposed by the Proposed Plan; the properties are located in or near Subareas 17:1, 17:2, 17:3, 40, 40:1, 40:1B, and 40:2 in and near the Media District. The comment states that the City has considered part of the HMD BID's zoning request but there is opportunity for more development to improve the jobs-housing balance by placing housing near jobs and transit. The comment states that the City has a housing need, including affordable units, and needs to meet Regional Housing Needs Assessment targets developed by SCAG.

Please see **Response 74-2**. In addition, the Proposed Plan is encouraging and incentivizing additional affordable housing development through the proposed Hollywood Community Plan Implementation Overlay (CPIO) District. Subarea 41 located near the Media District is a multi-family housing opportunity area, where additional units could be built under the Proposed Plan when projects include affordable housing. Please see Final EIR Updated **Appendix E**: Proposed Community Plan Implementation Overlay (CPIO). Separate from the Proposed Plan, under a different work program, the City has launched the 2021-2029 update to the Housing Element, which will address SCAG's Regional Housing Needs Assessment.

Response 75-5

The comment states that HMD now has a variety of development, including new media, general office, interior design, art galleries, and mixed-use that is no longer only industrial. The comment states that the HMD area is able to have complementary residential and commercial uses within the existing industrial spaces, which would provide additional housing for the City and reduce VMT impacts.

The comment is noted. The Proposed Plan concluded a less than significant impact with regard to VMT thresholds under Impact 4.15-2 of the Recirculated Draft EIR Section 4.15, Transportation and Traffic; see pages 4.15-40 to 4.15-41 for more information. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 76

Just Hollywood Coalition
(Thai CDC, Food & Water Watch, Coalition for Economic Survival, Unite Here! Local 11, Ground Game LA, LA Voice, and ACT LA)

Response 76-1

The comment states that the coalition's 4H Plan/Just Hollywood Plan would create less displacement, encourage use of public transportation, and ensure that affordable housing is built. The comment also states that the Proposed Plan would allow significant commercial development, which produces more traffic and vehicle miles than housing, whereas affordable housing generates less traffic and trips than market rate units. The comment states that increasing the base FAR in parts of Hollywood would discourage use of affordable housing incentives, and that FAR increases be based on requiring progressively more affordable housing for each successive increase, like the existing TOC incentives.

Increases in base FAR are being tied to the provision of affordable housing in selected areas of the Community Plan Area through the Hollywood CPIO District, and successive increases in FAR are tied to the provision of more affordable housing, similar to the existing TOC affordable housing incentive program. Please see **Master Response No. 6 -- Displacement and Affordable Housing** and the Final EIR Updated **Appendix E**: Proposed CPIO. Otherwise, the commenter has not identified or provided substantial evidence demonstrating that new or different analysis or conclusion is required in the RDEIR. No further response is required.

Response 76-2

The comment states that the Draft Community Plan does not have requirements or incentives for developers to use strategies to limit VMT, for example to provide transit passes. The comment states that the coalition's plan to require new hospitality development to be evaluated via a conditional use permit would take into account strategies to limit VMT, including local hiring and incentives for transit. The comment states that the coalition's plan would require height or FAR increases to provide free transit passes to workers for example, which would reduce VMT.

The Community Plan has goals and policies to reduce VMT, and includes policies and programs to encourage local hire; see policies under Goal M.2 in Chapter 6: Mobility and Connectivity of the Community Plan (Final EIR Updated **Appendix D**) and **Master Response No. 6 -- Displacement and Affordable Housing**. LA Department of Transportation has developed a VMT Calculator which also includes transportation demand management strategies for individual projects to reduce project VMT. The seven TDM strategies are parking, transit, education and encouragement, commute trip reductions, shared mobility, bicycle infrastructure, and neighborhood enhancement. Additionally, the City is currently comprehensively

updating its TDM ordinance under a separate work program to meet the City's goal for reducing VMT. The EIR does not identify significant impacts related to transportation and mitigation measures are not required.

Response 76-3

The comment states that a lead agency must select a reasonable range of alternatives for evaluation under CEQA, and questions why the alternative suggested by the commenter was not studied. The comment urges that the coalition's suggested alternative for more housing and sustainable mobility be considered.

A reasonable range of alternatives was evaluated by the Proposed Plan. As discussed on page 5-1 of the EIR, CEQA Guidelines Section 15126.6 requires that:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative* merits *of the alternatives.*

The purpose of the Alternatives chapter is to provide reasonable alternatives that reduce one or more identified significant impacts of a project in order to aid decision makers in weighing the merits of a project against the potential environmental impacts disclosed throughout the EIR. The EIR need not account for every conceivable alternative to the Proposed Plan. The comment does not provide substantial evidence, and the City does not find, that the requested alternative would reduce one or more identified significant impacts of the Proposed Plan.

LETTER NO. 77

Jeanne Clark

Responses 77-1 and 77-2

The comment states that different sections of Beachwood Drive do not meet the dimensions of the collector street classification. The comment also states that the misclassification had been noted by residents during the Mobility plan process and earlier iterations of the Hollywood Community Plan. Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The comment states that the misidentification leads to inaccurate VMT and overstatements of volume capacity and level of service.

The comment also states that Canyon Drive off of Franklin is a Collector street and has been classified as the western motorized vehicle entrance into Griffith Park. The commenter requests City documents to correct the classification of Beachwood Drive, including notifying the Bureau of Engineering, and to add Canyon Drive as an area for transportation improvement with LADOT Dash service.

Beachwood Drive has long been designated as a collector street, and the Mobility Plan 2035 maintained the designation when it was adopted in 2016. Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. Beachwood Drive between Franklin Avenue and Ledgewood Drive will retain the Collector street designation. The Hollywood Community Plan includes Program 121 as a future implementation program to study ways to provide improved pedestrian, vehicle, and public transit access to Griffith Park and Runyon Canyon Park, which could address the future expansion of DASH services.

Beachwood Drive currently has one vehicle travel lane in each direction. As to the comment that the VMT and LOS are inaccurate because of the misclassification of Beachwood, the number of existing travel lanes

would not change if the street were designated as a Collector Street or a Hillside Limited Standard Street and therefore would not affect travel volumes that were analyzed in the EIR.

LETTER NO. 78

Maureen Tabor

Response 78-1

The comment states that the commenter has been a 25-year property owner in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that Canyon Drive meets the definition of a collector street, is the official opening into Griffith Park, and to replace the identification of Beachwood Drive in the transportation element with Canyon Drive instead.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 79

Alexa Williams

Response 79-1

The comment states that the commenter has been a property owner in Hollywoodland for decades and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that Canyon Drive meets the definition of a collector street, is the official opening into Griffith Park, and to replace the identification of Beachwood Drive in the transportation element with Canyon Drive instead.

Please see **Response 78-1**.

LETTER NO. 80

Linda Doe
3135 Duran Drive
Los Angeles, CA 90068

Response 80-1

The comment states that the commenter is upset to see Beachwood Drive illegally shown and promoted by the City for shuttles, trams, and tourism. The comment states that the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and the residential community is a prime area for wildfires. The comment also states that Canyon Drive is a collector street, leads into the entrance of Griffith Park, and to replace the identification of Beachwood Drive with Canyon Drive in the transportation element, or else homeowners would be subject to death by fire.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. Mobility

Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 81

Christine Mills O'Brien

Response 81-1

The comment provides an introduction to concerns and opinions regarding the street classification for Beachwood Drive. The comment specifically highlights the measurement of the street and states that its current classification is incorrect. The commenter further states that their concerns have been ignored.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive, because this portion of Beachwood Drive is not currently improved with sidewalks and the existing width of the right of way is consistent with the Hillside Limited Standard Street width.

Response 81-2

The commenter provides a list of measurements for segments of Beachwood Drive as measured by Hollywoodland owners in November 2019.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 81-3

The commenter provides an amended version of a list of measurements for segments of Beachwood Drive and Canyon Drive as measured by Hollywoodland owners in November 2019. This list provides Canyon Drive measurements whereas the list in Comment 81-2 only had Beachwood Drive measurements.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 81-4

The comment states that Beachwood cannot be designated as a collector street and requests that the designation be corrected. The comment also requests to remove the identification of Beachwood Drive in all Community Plan text and maps. The comment also requests that Canyon Drive be identified as a collector street and entrance into Griffith Park in all Community Plan text and maps.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. The informational maps in the Community Plan are for reference only and are not adopted as part of the Community Plan. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment, which is further detailed in the Staff Recommendation

Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

Response 81-5

The comment asks why other collector streets, such as Tahoe Drive, are not discussed or selected.

The description of hillside roadways in the Plan and EIR are intended to provide a broad overview of the roadway network. The mention of specific street names or lack thereof does not indicate that a hillside roadway has more or less importance in the Plan. In addition, showing or not showing a street label in the Plan is a mapping exercise and does not change the functionality of that street. The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 81-6

The comment requests to correct all tables that misidentify Beachwood Drive as a collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

Response 81-7

The comment states that a new Griffith Park Transit Service was announced by Council District 4 the week of November 25, 2019 and began service the first week of December, and to include this information in Table 4.15-5.

The Parkline is a new weekend shuttle service operated by RAP established in December 2019. Branded shuttle buses, each seating 24 passengers with extra room for strollers and wheelchairs and a bike rack on the front for bicyclists, provide free circulator service to 13 major destinations within Griffith Park along a 14.2 mile round-trip route, connecting all existing Metro and DASH bus stops in and around the park. Headways are 15 to 20 minutes, and current hours of operation are Saturdays and Sundays from noon (two hours after the Zoo opens to the public each day) to 10:00 PM. This service began following the publication of the recirculated EIR and does not change the analysis conclusions or impact findings in Section 4.15, Transportation and Traffic. While the comment requests an update to Table 4.15-5, this table is not related to transit service, and therefore, the commenter is likely referring to Figure 4.15-5 in the EIR. This figure illustrates weekday transit service in the Plan area, although most of the service also extends to weekend days. Since this new service is only provided on the weekends, Figure 4.15-5 has not been updated.

Response 81-8

The comment states that although the purpose of the Proposed Plan revolves around future development, tourism in Hollywood and its impact on communities is neglected in the analysis. The commenter also states that Uber and Lyft are conflicting with the Mayor's vision on transportation and that the City is not protecting single-family residences from the effects of these mobility services.

Visitors to Hollywood are reflected in the VMT analysis of the Proposed Plan. As explained in Section 4.15 on page 4.15-29, the EIR analyzes VMT as Total Daily VMT per Service Population, which equates to all VMT for the Plan Area divided by the number of people living and working within the Plan Area. The Total Daily VMT per Service Population is the VMT generated by residents, employees, and visitors in Hollywood

and captures their travel within Hollywood as well as travel between Hollywood and their ultimate origin/destination, and then divided by the number of people living and working within the Plan Area. VMT per service population showcases the effects of all vehicular movement in an area. It includes not only trips that are attracted and produced by home and work trips, but those that fit in neither category (i.e., school to grocery store, or visitors) as well as truck trips. It is therefore more representative of the effect of users and trips on the roadways in the Plan Area when compared to common household or employment generated VMT metrics.

The second comment is expressing a Citywide policy concern and is not specifically related to the Plan. However, neighborhood intrusion concerns in the Plan Area is discussed in Section 4.15 on page 4.15-52 for informational purposes only. The EIR discusses that although neighborhood traffic intrusion is no longer a CEQA threshold, neighborhood traffic intrusion can be caused by traffic generated by the Plan, and/or traffic diverted or shifted onto local streets in residential neighborhoods as a result of the Plan. Given that the share of roadway street segments projected to operate at LOS E or F exceeds the share for the existing conditions in the AM and PM peak periods, some drivers may divert from the major corridors in the Project Area to parallel routes, which may include Uber and Lyft vehicles. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 81-9

The comment states that the RAP department has proposed introducing an aerial tram, and this would impact the environment and the Hollywoodland neighborhood. The comment also states that some closed roadways, if opened, inside Griffith Park could alleviate some of the north/south traffic.

In 2019, the Board of Recreation and Parks Commission approved funding to complete the Griffith Park Aerial Tram Feasibility Study. If decision-makers choose to move forward with any of the route options presented in the study, the project will be required to conduct an environmental review as required by the California Environmental Quality Act. The Proposed Plan does not include an aerial tram. Such a proposal is a separate and independent project and would need additional environmental study that is separate from the Proposed Plan.

Response 81-10

The comment states that LAFD's response time in urban settings is 8 minutes 59 seconds including processing. The comment states that this information is vague and asks what happens when streets are curved with grades, and if pedestrians clog a narrow roadway.

The EIR does not state that LAFD's response time in urban settings is 8 minutes 59 seconds including processing. As stated on page 4.15-58, emergency responders across the nation frequently reference the 8 minutes 59 seconds response time standard for advanced life support incidents in urban settings. Tables 4.15-13 through 4.15-15 show LAFD's average operational response times for the entire City and by individual stations in the Hollywood Community Plan Area for non-emergency medical situations, structure fires, emergency medical services, and advanced life support. A majority of the average operational response times are between 5 minutes and 8 minutes for each category. The times vary by station, and are generally higher for the stations located in the Cahuenga Pass and Silver Lake. LAFD is preparing a Standards of Cover deployment plan that will address appropriate response times, staffing, and equipment throughout the City.

Response 81-11

The comment states that the Project Area is described as being served by a network of grid system of arterials except that in areas north of Franklin Avenue, the road network becomes increasingly curvilinear into the hills. The comment states that Beachwood Drive is being actively marketed but Canyon Drive is not and meets this definition.

The description of the Community Plan Area having a grid system with arterial streets south of Franklin Avenue and curvilinear streets in the hillsides is generally correct as stated on page 4.15-10 of Section 4.15, Transportation and Traffic. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 81-12

The comment states that some of the objectives of the Mobility Plan 2035 seem unrealistic, and hillside neighborhoods can never have the same infrastructure (grid street pattern).

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 81-13

The comment references the five major goals from LAFD's Strategic Plan 2018-2020, and states that some of the language used is difficult to define in order to be actionable. The comment asks what these words mean: exceptional, advanced technology, and enhance sustainability and community resiliency. The comment asks what happened to protect and serve rather than increasing opportunities for personal growth and professional development.

The 42-page LAFD Strategic Plan 2018-2020 is publicly available, including online: https://www.lafd.org/about/about-lafd/strategic-plan. The plan describes strategies associated with each of the five goals and provides additional information, including actionable items for each strategy. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 82

B. Faix

Response 82-1

The comment states that the commenter has been a 5-year property owner in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that the commenter is upset that Beachwood Drive is inaccurately shown and promoted, and the past Community Plan was dismissed by a judge because of inaccurate data. The comment also states that Canyon Drive meets the definition of a collector street, is the official opening into Griffith Park, and to replace the identification of Beachwood Drive in the transportation element with Canyon Drive instead.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. The informational maps in the Community Plan, which have Beachwood Canyon has one of the street labels, are for reference only and are not adopted as part of the Community Plan. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 83

Jim Krantz
3055 North Beachwood Drive
Los Angeles, CA 90068

Response 83-1

The comment states that the commenter has lived in Beachwood Canyon since 2015, and the street has no sidewalks and blind turns, and it is hazardous already even without the recent proposal to provide additional access to tourists and hikers. The comment states that the area is dry and is ripe for fire from tourists smoking cannabis and cigarettes. The comment also states that a proposal to allow buses for tourists would invite social media attention and become an accident site. The comment states that Beachwood Drive is only 30 feet wide here and is not a Hillside Collector street, and the consideration of using Beachwood Drive as a feeder route to anything else except the residences here is potentially fatal. The commenter provided a photograph that they represent shows conditions on the street in front of their house on a Saturday.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. To extent that the commenter suggests that tourists and visitors represent a safety hazard, the Proposed Plan includes no actions or policies that encourage, incentivize or will result in any visitor or tourist activity in the area. The conditions described by the commenter are existing conditions and the commenter has not provided substantial evidence supporting that the Proposed Plan will exacerbate existing conditions such that a safety risk will result. No further response is necessary.

LETTER NO. 84

Laura Davis
2805 North Beachwood Drive
Los Angeles, CA 90068

Response 84-1

The comment states that the commenter has been a 32-year property owner in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that Canyon Drive meets the definition of a collector street, is the official opening into Griffith Park, and to remove Beachwood Drive in the transportation element as a collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 85

Tjardus Greidanus
2805 North Beachwood Drive
Los Angeles, CA 90068

Response 85-1

The comment requests to remove Beachwood Drive as a Hillside Collector Street from the transportation element of the Hollywood Community Plan because the portion of Beachwood Drive in Hollywoodland is 30 feet wide and it does not meet the definition of a Hillside Collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 86

David Livingston
2750 North Beachwood Drive
Los Angeles, CA 90068

Response 86-1

The comment states that the commenter has been a property owner in Hollywoodland for more than 19 years and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that Canyon Drive, located nearby, is the official opening into Griffith Park, and to remove Beachwood Drive in the transportation element as a collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 87

Guy Ferland
3130 North Beachwood Drive
Los Angeles, CA 90068

Response 87-1

The comment states that the commenter has lived on Beachwood Drive for 12 years, Beachwood Drive does not meet the definition of a Hillside Collector street, and to replace the identification of Beachwood Drive with Canyon Drive, the entry into Griffith Park. The commenter states that the commenter has seen the end of Beachwood Drive inundated with tourists and traffic that the street cannot handle such a plan.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The informational maps in the Community Plan, which notes Beachwood Drive as a street label, are for reference only and are not adopted as part of the Community Plan. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

To extent that the commenter suggests that tourists and visitors represent a safety hazard, the Proposed Plan includes no actions or policies that encourage, incentivize or will result in any visitor or tourist activity in the area. The conditions described by the commenter are existing conditions and the commenter has not provided substantial evidence supporting that the Proposed Plan will exacerbate existing conditions such that a safety risk will result. No further response is necessary.

LETTER NO. 88

Edward Sheftel

Response 88-1

The comment states that the commenter has been a property owner for 20 years and agrees with Laura Davis's comments, which are included as two attached emails. The comment from one of the attached emails states that Beachwood Drive cannot handle the electronic shuttle service proposed by Councilman Ryu. The comment from the second attached email states the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that Canyon Drive meets the definition of a collector street, is the official opening into Griffith Park, and to remove Beachwood Drive in the transportation element as a collector street.

The proposed electric shuttle is independent of the Proposed Plan. Please see **Response 84-1**.

LETTER NO. 89

Tinker Lindsay
2805 North Beachwood Drive
Los Angeles, CA 90068

Response 89-1

The comment states that the commenter has been a property owner for 39 years in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street, and is a substandard street. The comment states that Canyon Drive, located nearby, is the official opening into Griffith Park and Beachwood Drive cannot handle the electronic shuttle service proposed by Councilman Ryu. The comment requests the removal of Beachwood Drive as a collector street from the transportation element.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. Additionally, the Proposed Plan does not plan for, accommodate, or in any way address the use of a shuttle service in or around Griffith Park. The proposed electric shuttle is independent of the Proposed Plan.

LETTER NO. 90

Hope Anderson
2800 North Beachwood Drive
Los Angeles, CA 90068

Response 90-1

The comment states concern with Councilmember Ryu's latest attempt to have a shuttle run on Beachwood Drive to Griffith Park. The comment states that the Hollywoodland section of Beachwood Drive is too narrow to be a Hillside Collector street, and cannot be used for commercial buses. The comment also states

that the illegal entrance into Griffith Park at the end of Beachwood Drive has been closed by court order. The comment states that the commenter has owned a house in the area for 14 years and has fought for safety issues for the community, and election day cannot come soon enough.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street. See Response 89-1 related to a shuttle on Beachwood.

LETTER NO. 91

Robert Andrus

Response 91-1

The comment states that the commenter has lived in Beachwood Canyon for 11 years and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that Canyon Drive is a collector street and the official opening into Griffith Park, and to replace Beachwood Drive with Canyon Drive as the street going into Griffith Park.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 92

Cheryl Veltri

Response 92-1

The comment states that the commenter has been a longtime property owner in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street. The comment also states that Canyon Drive is a collector street and the official opening into Griffith Park, and to replace the identification of Beachwood Drive in the transportation element with Canyon Drive instead.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 93

Paul Martin
2761 N. Beachwood Drive
Los Angeles, CA 90068

Response 93-1

The comment states that the commenter is a property owner in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and is a substandard street. The comment also states that Canyon Drive is the official opening into Griffith Park, and to remove Beachwood Drive as a collector street from the transportation element.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 94

Jay Heit
3177 N. Beachwood Drive
Los Angeles, CA 90068

Response 94-1

The comment states that the commenter heard about a new shuttle bus service ending at the top of Beachwood Drive and is confused by the news. The commenter states there are no facilities to serve the tourists at the top of Beachwood Drive and requests to stop the shuttle before it begins.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**. See **Response 89-**1.

LETTER NO. 95

Susan Krantz

Response 95-1

The comment states the Dixon Report is pushing Beachwood Drive as a tourist entry into Griffith Park, but that entry was closed by a court order, and this area is a neighborhood not a national park or amusement park. The comment also states that the Dixon Report is inaccurate and does not give thought to wildlife and the fire hazards in the area. The comment also states Beachwood Drive is falsely presented as a Hillside Collector street despite not meeting the dimension requirements, and there is a lack of sidewalks shortly past the gates on lower Beachwood Drive. The comment also states that Beachwood Drive does not have proper amenities for tourists, including water, parking, access to facilities, and food.

The comment is noted; the Dixon Report is not part of the Proposed Plan, nor is a shuttle bus. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Response 89-1** and **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 96

TJ Escott
3009 N. Beachwood Drive
Los Angeles, CA 90068

Response 96-1

The comment states that the commenter is a longtime resident of Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and is a substandard street. The comment states the commenter's concern about the dangers to pedestrians and vehicular traffic on Beachwood Drive. The comment also requests the removal of Beachwood Drive as a collector street from the transportation element and Canyon Drive is the entrance into Griffith Park.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 97

Janine Riveire
3109 N. Beachwood Drive
Los Angeles, CA 90068

Response 97-1

The comment states that the commenter is a property owner in Hollywoodland and the dimension of Beachwood Drive (less than 30 feet wide with one three-foot sidewalk on one side) in front of her house does not meet the definition of a collector street. The comment also states that Canyon Drive is a collector street and the entry into Griffith Park, and to replace the identification of Beachwood Drive in the transportation element with Canyon Drive instead.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 98

James Mykytenko, MD, FACS

Response 98-1

The comment states that Beachwood Drive does not meet the definition of a Hillside Collector street and is substandard, only 30 feet wide north of the village. The commenter states concern for the safety of the neighborhood if Hollywoodland and Beachwood Drive are continued to be promoted by the City as a tourist destination. The comment states that the end of Beachwood Drive was closed by court order, Canyon Drive is the opening into Griffith Park and has sidewalks from Franklin into the park, and requests removing Beachwood Drive as a Hillside Collector street and replace it with Canyon Drive.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive (between Ledgewood Drive and Linforth Drive) from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 99

Findlay Bunting
2953 N. Beachwood Drive
Los Angeles, CA 90068

Response 99-1

The comment states that the commenter has lived on Beachwood Drive for 25 years and the description of Beachwood Drive as a Hillside Collector street is incorrect. The comment also states that Beachwood Drive has never been an access point into Griffith Park and lacks the roadway and facilities for tourists and hikers.

Please see **Response 77-2**.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 100

Alison Starr
3020 N. Beachwood Drive
Los Angeles, CA 90068

Response 100-1

The comment states that the commenter is a property owner in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and needs to be corrected. The comment also states that the commenter is upset that Beachwood Drive is inaccurately shown and promoted and has seen how tourism impacts the safety of the neighborhood. The comment also states that Canyon Drive is a collector street and the official opening into Griffith Park, and to replace the identification of Beachwood Drive in the transportation element with Canyon Drive instead.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 101

Richard Evans
3156 North Beachwood Drive
Los Angeles, CA 90068

Response 101-1

The comment states that the commenter has been a property owner in Hollywood since 2013, and Beachwood Drive does not meet the definition of a Hillside Collector street. The comment states that Canyon Drive is the official opening into Griffith Park and has sidewalks from Franklin into the entry point of the park. The comment requests to remove Beachwood Drive as a Hillside Collector street and replace it with Canyon Drive.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 102

David Shew
953 School Street, #239
Napa, CA 94559-2824

Response 102-1

The comment states that the commenter retired from CAL Fire, has a wildfire consulting company. The comment states that Hollywoodland residents have concerns about a potential wildfire and access issues is one of the primary concerns. The comment states that the dimensions of Beachwood Drive does not meet the definition of a collector street, and in the event of a wildfire narrow street dimensions will not function in the manner envisioned. The comment also states that community evacuations around the state in the last few years have been problematic, and inaccurate data can place people's lives at risk when a wildfire event happens. The comment requests removal of Beachwood Drive as a collector street from the transportation element.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 103

Anne Marie and David Kashkooli
2851 North Beachwood Drive
Los Angeles, CA 90068

Response 103-1

The comment states that the commenter has been a property owner in Hollywoodland for 15 years and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and is substandard. The comment states that the past Community Plan was dismissed by a judge because of inaccurate data. The comment also states that Canyon Drive is the official entrance into Griffith Park, and to remove Beachwood Drive in the transportation element as a collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 104

John Schwartz, Esq.

Response 104-1

The comment states that Beachwood Drive is mischaracterized as a collector street but it is not wide enough and some portions do not have sidewalks.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street.

Response 104-2

The comment states that the mischaracterization of Beachwood Drive can have significant and potentially catastrophic consequences because of the pedestrian and vehicular congestion added on a daily basis. The comment also states that in the event of a fire or other emergency, there could be catastrophic damage to persons and properties because of the limited ingress and egress, and the risk and exposure to the City from litigation would be incalculable.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street.

LETTER NO. 105

Sarajane Schwartz
Homeowners on Beachwood Drive United

Response 105-1

The comment contains introductory remarks about the commenter, who was a past president of the Hollywoodland Homeowners Association and someone who was active in the litigation against the previous Hollywood Community Plan update. The comment also states that Hollywoodland is in a very high fire severity hazard zone, is a bottleneck into Griffith Park, and is vulnerable to fires and disasters because the area does not have standard infrastructure.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 105-2

The comment expresses concern about the continuous mischaracterization of Beachwood Drive as a collector street. The comment states that Beachwood is much narrower than the measurements of a collector street and has no sidewalks in many places.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street.

Response 105-3

The comment states that in recent years, a judge closed an access point into Griffith Park at the end of Beachwood. The comment states in that ruling, the judge stated that people should be directed to enter Griffith Park from Canyon Drive, the official opening into the park. The comment states that Canyon Drive is a straight street with sidewalks and has the infrastructure for safety.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 105-4

The comment states the continued mischaracterization of Beachwood Drive will cause further delay and litigation with the Plan update and possible harm and injury to the Hollywoodland neighborhoods. The comment requests the removal of Beachwood Drive as a collector street. The comment also states that streets such as Beachwood Drive need to be protected because it can only serve the needs of residents, has limited ingress and egress, and is located in a very high fire severity zone as opposed to current City policies that encourage added tourism, traffic and congestion. The comment also mentions that an attachment from an attorney that has been used to stop the misuse of Beachwood Drive is provided.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 106

Tony Clark
2933 N. Beachwood Drive
Los Angeles, CA 90068

Response 106-1

The comment states that Beachwood Drive was an illegal access to Griffith Park and was closed by court order so there is no reason to have a shuttle running on this street. The comment states that the shuttle program recently introduced by Mayor Garcetti is wonderful. The comment also states that Beachwood Drive is not a Hillside Collector street but a quiet community and fire trucks and other emergency vehicles have a hard time accessing Beachwood Drive already.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. See **Response 89-1**.

LETTER NO. 107

Lynne Pateman
2953 N. Beachwood Drive
Los Angeles, CA 90068

Response 107-1

The comment states that the commenter has been a property owner in Hollywoodland for more than 30 years and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and is substandard. The comment states that the past Community Plan was dismissed by a judge because of inaccurate data. The commenter also states that Beachwood is a special place to live but in recent years, out of control tourism to the area has been problematic, and the commenter's vehicles have been damaged from hit and runs. The commenter requests to remove Beachwood Drive as a Hillside Collector street from the transportation element and replace it with Canyon Drive, the official entry into the park.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 108

Guy Williams and Victor Zolfo
2845 N. Beachwood Drive
Los Angeles, CA 90068

Response 108-1

The comment states that the commenter is a property owner on Beachwood Drive in Hollywoodland and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and is substandard. The comment states that the past Community Plan was dismissed by a judge because of inaccurate data. The comment also states that Canyon Drive is the official entrance into Griffith Park, and to remove Beachwood Drive in the transportation element as a collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 109

Katherine Hartley
2872 Westshire Drive
Los Angeles, CA 90068

Response 109-1

The comment states that the commenter has been property owner on Westshire Drive in Hollywoodland for six years and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and is substandard. The comment states that the past Community Plan was dismissed by a judge because of inaccurate data. The comment also states that Canyon Drive is the official entrance into Griffith Park, and to remove Beachwood Drive in the transportation element as a collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The informational maps in the Community Plan, which note Beachwood Drive as one of the streets in the CPA, are for reference only and are not adopted as part of the Community Plan. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 110

Christine Kent
3204 Beachwood Drive
Los Angeles, CA 90068

Response 110-1

The comment states that the commenter has been a property owner in Hollywoodland for more than 10 years and the dimension of Beachwood Drive (30 feet wide) within Hollywoodland does not meet the definition of a collector street and is substandard. The comment states that the past Community Plan was dismissed by a judge because of inaccurate data. The comment also states that Canyon Drive is the official entrance into Griffith Park, and to remove Beachwood Drive in the transportation element as a collector street.

Please see the Staff Recommendation Report for CPC-2016-1450-CPU that includes the recommendation to amend Mobility Plan 2035 to modify the street designation of a portion of Beachwood Drive between Ledgewood Drive and Linforth Drive from a Collector Street to a Hillside Limited Standard Street. The Mobility Plan 2035 currently notes a portion of both Beachwood Drive and Canyon Drive as Collectors. The recommended amendment, which is further detailed in the Staff Recommendation Report, will also amend the maps in Mobility Plan 2035 to remove the Collector street designation for Beachwood Drive between Ledgewood Drive and Linforth Drive.

LETTER NO. 111

Jean Mason
2777 Woodshire Drive
Los Angeles, CA 90068

Response 111-1

The comment states that the flood of tourists has become a major crisis in Beachwood Canyon because they prevent residents from parking in front of their own houses and strangers knock on their doors to ask to use their bathrooms. The comment states that the Canyon Drive Girl's Camp located only five blocks to the east was designed to accommodate large groups, and has bathrooms, water fountains and parking for 60 cars, and has a good view of the Hollywood Sign.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 112

Larry Boring
1428 N. Orange Grove Avenue
Los Angeles, CA 90046

Response 112-1

The comment states support for Alternative 2 if it protects established R1 and HPOZ neighborhoods.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 113

Orrin M. Feldman, Esq.
2733 Woodstock Road
Los Angeles, CA 90046

Response 113-1

The commenter provides introductory remarks and states concerns about the revised criteria being used to evaluate transportation impacts in Section 4.15 of the EIR. The commenter states that stakeholders attending the Hollywood Hills West Neighborhood Council PLUM meeting on December 2, 2019 had concerns and both committee members and stakeholders agreed that congestion and delay are better ways to measure transportation impacts and that VMT analysis may result in future development projects not being required to provide mitigation measures to relieve congestion and delay.

The comment is noted. The transportation impact thresholds were changed as a result of legislation passed under SB 743. Please see **Master Response No. 8 – Transportation & Traffic** for additional context as to why vehicular circulation impacts can no longer be mitigated in urban areas, such as Hollywood, and how this has led to the adoption of new CEQA Guidelines in early 2019 to comply with SB 743.

Response 113-2

The comment states that addressing congestion and delay as secondary impacts results in the residents wondering how secondary impacts and mitigation measures would be evaluated and if transportation studies would still be required. The comment also states that it would be irrational to use VMT as an excuse to measure and mitigate traffic impacts in Hollywood because it already has many dense neighborhoods and people could use transit options but it does not mean they would use them.

The comment raises concerns over the process of reviewing future development projects and is not questioning the analysis or impact findings contained in the EIR. The change to the City's transportation thresholds and transportation study guidelines is in response to legislation passed under SB 743 and not caused by the Proposed Plan. As stated in Section 4.15 on page 4.15-39, individual development projects will need to adhere to the requirements in LADOT's adopted *Transportation Assessment Guidelines*. Please also see **Response 113-4**.

Response 113-3

The comment states that the conclusions in Appendix N seems to be a way for the Department to excuse applicants from implementing reasonable mitigation measures for their projects. The comment states that the EIR does not address the potential existing impact of haul trucks staging on Fairfax Avenue between Sunset and Santa Monica Boulevards, and it seems that many of these trucks are servicing projects in the City of West Hollywood, not Los Angeles. The comment also notes that trucks are being staged and idled on Sepulveda Boulevard north of Santa Monica Boulevard in Council District 5.

The commenter's comments on Appendix N are wrong because Appendix N does not address mitigation or provide the impact analysis for the thresholds of significance. Appendix N provides feasibility analysis that supports that the City does not have a method to identify the associated risks to human health with the significant impacts to air pollutant criteria identified in the EIR. The impact analysis was provided in Impact Section 4.3, Air Quality, in the EIR, which analyzed all air impacts from the Proposed Plan and identified significant unavoidable impacts from contributions to violations of air quality standards from operations and construction, and cumulatively net increase of criteria pollutants, and for sensitive receptors for construction. Based on those potential significant impacts, the EIR identified.

Mitigation Measure **AQ1** to reduce pollutant emission within the Hollywood CPA. The mitigation measure includes eight specific control measures, including requiring more efficient engine standards. It is anticipated

that Mitigation Measure **AQ1** would result in a 50 to 90 percent reduction in NOx and PM emissions from diesel-powered off-road construction equipment relative to Tier 3 engines, which are typically used as the industry standard. The requirement of engines meeting Tier 4 emissions standards is becoming more common as the equipment is more widely available. For instance, Los Angeles County Metropolitan Transportation Authority requires the use of Tier 4 engines in all of their construction projects. Heavy-duty trucks are a substantial source of emissions in addition to construction equipment. However, on-road heavy-duty haul trucks are not regulated under the same off-road emissions standards, and the City cannot feasibly require all construction-related on-road trucks operating within City limits to adhere to more stringent engine emissions standards.

It is infeasible to speculate the magnitude of emissions associated with simultaneous construction of multiple projects throughout the Project area. Therefore, it is conservatively concluded that regional impacts from construction would remain potentially ***significant and unavoidable***. Importantly, Mitigation Measure **AQ1** is a legally binding commitment for the City to implement in association with development undertaken pursuant to the Proposed Plan.

Existing conditions are addressed as part of the base conditions in the environmental setting and are not considered an impact as they do not represent a change. Regarding staging of haul trucks, projects requiring these trucks must go through an approval process that typically includes CEQA analysis. The CEQA analysis for each project must identify all potential impacts and identify mitigation measures, as appropriate. As indicated in the Air Quality analysis of the Hollywood Community Plan, construction projects with over 100 daily truck trips would be expected to exceed SCAQMD thresholds of significance. Projects that would require this level of equipment use/truck trips would be expected to be larger than the threshold for site plan review and would require discretionary review. Projects with substantial truck trips would be examined on a case-by-case basis and control measures identified, as appropriate and feasible.

The City encourages the commenter to report excessive commercial vehicle idling beyond the California Air Resource Airborne Toxic Control Measure regulation. This regulation requires that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle's primary diesel engine longer than five minutes at any location. The Airborne Toxic Control Measure may be viewed at https://ww3.arb.ca.gov/msprog/truck-idling/13ccr2485_09022016.pdf. An internet-based complaint form may be accessed at https://ww3.arb.ca.gov/enf/complaints/icv.htm.

Response 113-4

The comment states that the RDEIR provisions, including the new Appendix N, should help establish a good framework for future development under the Community Plan Update but the recirculated portions seem to lack the details required to establish a clear framework. The comment states that the RDEIR provisions seem to provide the department with ways of excusing, not requiring or even avoiding having to require applicants for major proposed projects to provide real analysis of significant transportation and construction air quality impacts and potential mitigation measures. The comment states there should be more specific language in the Final EIR to address both issues and widespread concerns, and plugging in language to comply with State law requirements does not seem to be sufficient.

The comment is noted but it does not raise any new significant environmental issues and does not provide substantial evidence that would change the significant impacts of the Proposed Plan. See **Master Response No. 1 - General Comments and Non-CEQA Issues**. As stated in the RDEIR and in **Master Response No. 8 -- Transportation and Traffic**, the state is mandating the use of VMT as the transportation metric to analyze impacts and the CEQA Guidelines for transportation thresholds were also updated to reflect the VMT change. The City responded by adopting new transportation thresholds for CEQA in July 2019. Based on these state and City changes, Section 4.15, Transportation and Traffic was updated and re-circulated in October 2019 for public review and comment. The transportation impacts of individual discretionary projects

that surpass the screening criteria of 250 or more daily trips will need to analyze impacts related to transportation. Mitigation measures may include transit incentives, education and marketing, commute trip reductions, parking management, improved neighborhood connectivity, and shared mobility options. For more information about project development review and transportation assessments required by LADOT, visit: https://ladot.lacity.org/businesses/development-review. A document regarding LADOT transportation assessment guidelines is also available: https://ladot.lacity.org/businesses/development-review.

See also **Response 113-3** related to Appendix N comments.

LETTER NO. 114

Brian Dyer

Response 114-1

The commenter states that they appreciate the consideration of congestion as a secondary impact. The commenter is also requesting that the City adjust the description of land uses in close proximity to transit to refer to areas within a half mile walkshed of a bus stop or transit station instead of areas within a half mile radius of a stop or station. The commenter states that LA County's Metro encourages using a half mile walkshed, and provides an attachment to Metro's Active Transportation Strategic Plan web interface user guide as well as an attachment of an Federal Transit Administration manual on pedestrian and bicycle connections to transit.

Walking distance or walkshed is a more meaningful measurement of transit proximity. However, using a 0.5-mile walkshed instead of a 0.5-mile radius does not identify a new environmental impact. While a 0.5-mile walkshed captures the actual path a pedestrian would take to walk 0.5 miles, referring to a 0.5 mile radius implies a similar concept, especially in urban areas such as Hollywood that have a grid roadway network with pedestrian access and sidewalks on both sides of the roadways within the transit served areas. When considering a particular development, utilizing the walkshed definition is beneficial because it accounts for the pedestrian travel path between the front door of the building and the transit boarding platform or bus stop, and accounts for the true distance a pedestrian would need to travel to access transit between the time they leave a building and arrive at a transit stop. However, it is appropriate for a planning level study to utilize a 0.5-mile radius to describe transit proximity in urban areas such as Hollywood. While the two measurements would produce slightly different results, it would not change the impact conclusions in the EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

Response 114-2

The comment states that the concurrence of special events should be acknowledged in the EIR, and that more data should be provided showing the special events in the area over the past five years and their relation to traffic flow through the Cahuenga corridor. The commenter further states that street closures and the number of events over that time period can be counted and this data is available and should be used.

While data showing the number of special events could be obtained from the various venues and special event operators in the Plan Area, their specific relation to traffic flow over that same time period could not be retroactively collected. As explained in Section 4.15 on page 4.15-11, the data collection effort for the Existing Conditions assessment included traffic counts recorded by the Regional Integration of ITS Project (RIITS) during the months of February, March, April and May on a Tuesday, Wednesday and Thursday in 2016. Consequently, the count data utilized in the EIR represents a much more robust dataset than the traditional approach of collecting vehicle counts on a single day. Consequently, to the extent that event traffic occurred on a weekday (Tuesday through Thursday) during peak travel hours between the months of February and May, these travel demands are accounted for when calculating the average hourly volumes and

resulting VMT within the Plan Area under existing conditions, and this same level of special event traffic is also accounted for in the traffic forecasts and analysis of Year 2040 conditions that were utilized to identify potential VMT transportation impacts under Impact 4.15-2 and emergency access impacts under Impact 4.15-4. The commenter does not provide any substantial evidence that the collection of additional data would change the results of the transportation analysis or impact conclusions in the EIR for GHG. See Response to 48-4 and **Master Response No. 8 – Transportation & Traffic**.

Response 114-3

The comment states that tourists are not being included in the service population because service population is the sum of residents and employment in the Plan Area.

Visitors to Hollywood are reflected in the VMT analysis of the Proposed Plan. As explained in Section 4.15 on page 4.15-29, the EIR analyzes VMT as Total Daily VMT per Service Population, which equates to all VMT for the Plan Area divided by the number of people living and working within the Plan Area. The Total Daily VMT per Service Population is the VMT generated by residents, employees, and visitors in Hollywood and captures their travel within Hollywood as well as travel between Hollywood and their ultimate origin/destination, and then divided by the number of people living and working within the Plan Area. VMT per service population showcases the effects of all vehicular movement in an area. It includes not only trips that are attracted and produced by home and work trips, but those that fit in neither category (i.e., school to grocery store, or visitors) as well as truck trips. It is therefore more representative of the effect of users and trips on the roadways in the Plan Area when compared to common household or employment generated VMT metrics.

Response 114-4

The comment states that Los Angeles County had more than 48.3 million visitors in 2017 according to a Los Angeles Times article, and that while the EIR references visitors to the Plan Area it does not specifically mention tourism.

The reference to visitors in Section 4.15 on page 4.15-29, and specifically when discussing the types of travel accounted for in the VMT impact analysis includes tourism. The description of visitors was intended to include all types of visitors to the Hollywood area, whether they were visiting from another neighborhood in Los Angeles or another city, state or country. Please see **Response114-3** regarding visitors and tourism in the Plan Area.

Response 114-5

The comment states that the EIR should acknowledge the congestion and VMT impacts of autonomous vehicles and shared mobility, such as Uber, Lyft, and bikeshare programs, and provides attachments, including one from Fehr & Peers. The comment also states that VMT will increase due to tourism, especially with the future Olympics and hotels being built in the Plan Area.

The shared mobility study referenced in the comment is a memorandum from Fehr & Peers to Uber (*Estimated TNC Share of VMT in Six US Metropolitan Regions (Revision 1)*, August 6, 2019) that estimates that amount of VMT generated by Uber and Lyft in six metropolitan regions throughout the United States in a one month period of September 2018. The study found that Uber and Lyft account for an estimated range of 1.0 percent to 2.9 percent of the total VMT generated in these areas which means that all other vehicles account for 97 percent to 99 percent of the VMT. Specifically, within the Los Angeles metropolitan region, Uber and Lyft account for 1.5 percent of the VMT generated region-wide and 2.6 percent of the VMT generated in the area defined as the core county. The study also shows that approximately 50 percent of the VMT generated by Uber and Lyft occur when they are waiting for a ride request or heading to pick up a passenger and the other 50 percent occurs when a passenger is in the vehicle. The results of the study provide data for one period of time (September 2018) and show that Uber and Lyft to contribute to VMT

generation. However, none of the study findings change the impact conclusions in the EIR because the total percentage of VMT accounted for is low, less than 3 percent. In addition, a portion of trips that occur in an Uber/Lyft would otherwise occur in a personal vehicle which also generates VMT, meaning that the VMT generated by Uber/Lyft is not all new or additional VMT in an area.

The EIR discusses the effects of transportation technologies in Section 4.15 on page 4.15-33. As discussed, the transportation analysis approach used in the EIR applies established traffic forecasting tools that have been empirically proven and accepted under CEQA. However, these established traffic forecasting tools may prove to be conservative if higher levels of walking, bicycling, and transit use exceed what is forecast in the EIR resulting in less VMT than forecasted. It is possible, however, that innovations in autonomous and driverless vehicles, transportation network companies (e.g., Lyft and Uber), and same-day delivery will increase future VMT service population. A variety of factors contribute to VMT, and transportation technologies along with demographic trends will influence future travel behavior. It would be speculative to make assumptions about how these new technologies and changes in transportation may affect travel behavior long-term; therefore, the methodologies and travel forecasts applied in this analysis rely on the state-of-the-practice at this time as is accepted under CEQA. Please see **Response 114-3** regarding visitors and tourism in the Plan Area.

Response 114-6

The comment states that citations should be provided for the assertion that the Proposed Plan is responding to changing demographics, and references an article published by the Wall Street Journal in September 2019 stating that Millennials are giving up urban living and moving to the suburbs.

The EIR discussion in Section 4.15 mentions several changing demographic trends and is not predicated on the notion that all Millennials will want an urban living environment. As discussed on page 4.15-44, the Plan is responding to changing demographics, a younger population desirous of safe and accessible active transportation options, a growing number of residents and employees seeking alternatives to the car, and an aging population that may need to rely more and more on transportation alternatives to the automobile. This discussion occurs under Impact 4.15-3 regarding hazards due to geometric design features or incompatible uses, and the comment is not regarding the conclusions of the impact findings. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 114-7

The comment states that the secondary impacts to transportation are not taking into account in-lieu parking for new development, except for clubs and entertainment venues (Program 51). The commenter is requesting that the City consider in-lieu parking fees as implemented in Santa Monica and Beverly Hills to mitigate parking discrepancies in Hollywood. The commenter also states that the recent Council District 13 parking study should be utilized but does not provide a reference to the study.

In-lieu parking typically allows developers to pay an in-lieu fee instead of building the required amount of parking on their development site, which is not being considered in the Proposed Plan. Implementation Program 51 states: Consider allowing nightclub and other entertainment venues in the Regional Center to submit a private parking plan certified by LADOT to utilize underused private commercial parking areas for certification by the LADOT in lieu of providing required on-site parking spaces. This particular proposal would allow such venue operators flexibility in providing parking spaces and would require certification from the LADOT. The Hollywood CPIO allows parking reductions as an incentive for projects that provide a minimum percentage of affordable housing units, and exempts commercial change of use permits from triggering additional off-site parking requirements. The commenter does not state how the parking study would change the transportation analysis or impacts in the EIR. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 114-8

The commenter states that they appreciate the inclusion of neighborhood traffic intrusion as a secondary impact in the EIR, but that the analysis does not address concurrent special events and the influence of smartphone apps on neighborhood streets resulting in difficulties with emergency responses. The comment further states that the eight-minute response time of LAFD is not possible during Hollywood Bowl and Boulevard events. The comment also states it is unfortunate that the Plan leaves to LAFD to adjust to the Community Plan instead of the Community Plan adjusting to the safety needs of Los Angeles citizens.

A discussion of neighborhood intrusion is included in Section 4.15 on page 4.15-52. The EIR states that although neighborhood traffic intrusion is no longer a CEQA threshold, neighborhood traffic intrusion can be caused by traffic generated by the Plan, and/or traffic diverted or shifted onto local streets in residential neighborhoods as a result of the Plan. Given that the share of roadway street segments projected to operate at LOS E or F exceeds the share for the Existing conditions in the AM and PM peak periods, some drivers may divert from the major corridors in the Project Area to parallel routes. The comment that additional drivers may utilize neighborhood streets due to concurrent special events or because they are using a smartphone app does not change the qualitative assessment of the Plan's potential for neighborhood traffic intrusion. Please see **Master Response No. 5 – Emergency Services** and **Master Response No. 8 – Transportation & Traffic**.

LETTER NO. 115

Danielle Mead

Response 115-1

The comment states the information provided in Table 4.15-5 on page 4.15-19 of the RDEIR regarding Fire Station 41 is incorrect and that this station only has a staff of six and has an Engine Company and an Ambulance Unit, not a Truck Company. The commenter also notes that the updated response time data presented on page 4.15-54 should be included in Table 4.15-5.

Tables 4.15-5 in the RDEIR and 4.14-2 in the EIR have been revised to include updated information regarding the Fire Stations serving the Project Area. Please note that staffing levels and LAFD resources are subject to change, and the information presented may be out of date. Staffing or equipment changes at particular fire station does not affect the impact analysis in Impact Section 4.14 which found that the Proposed Plan may result in the need over the plan horizon for construction of new facilities. Please refer to Final EIR **Chapter 4.0**, **Corrections and Additions** for page 4.14-7 and 4.15-19.

Response 115-2

The comment is regarding DASH transit service on Fairfax Avenue and states that there is no such service.

The comment is incorrect. The DASH Fairfax route operates on Fairfax Avenue in the study area between Rosewood and Melrose Avenues, then continues west on Melrose towards La Cienega Boulevard. The DASH Fairfax Loop is shown on the DASH website: https://www.ladotbus.com/m/regions/7/routes.The Melrose and Fairfax bus stop was one of the heaviest utilized stops on the line as reflected in Figure 4.15-5.

Response 115-3

The comment is regarding the differences between filming and film-related events described in the EIR, and states that filming also occurs in the CPA and is not described in the EIR.

As explained on page 4.15-24, the description of special events is intended to provide an overview of the various activities that occur in Hollywood to illustrate the robust level of activity and events in the area and is not meant to be an exhaustive list of all current or potential future events. Many different types of events are

described in the EIR that require partial or full closure of city streets, including sidewalks and crosswalks, for periods of several hours to several days at a time. The expanded definition of filming and film-related events would not change the analysis or impacts findings in Section 4.15. The comment also does not provide any substantial evidence as to why an expanded definition of film-related events would change the conclusions in the EIR. Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 115-4

The comment states that the EIR incorrectly states that special events only occur on a Tuesday, Wednesday, or Thursday between February and May.

The statement in the EIR is regarding the time period for the transportation analysis. As discussed in Section 4.15 on page 4.15-24, special events in Hollywood frequently require partial or full closure of Hollywood Boulevard and other roadways in the Project Area, including sidewalks and crosswalks, for periods of several hours to several days at a time. To the extent that special event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) between the months of February and May, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area under Existing Conditions. Please also see **Master Response No. 8 – Transportation & Traffic**.

Response 115-5

The comment states the commenter's support for Alternative 2, which is stated as the Environmentally Superior Alternative in the EIR. The comment states that reduced FAR along selected corridors would allow the Plan to better achieve a goal to protect historic resources and preserve neighborhood character. The comment requests that Sunset Boulevard west of La Brea be a corridor where FAR is reduced.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

LETTER NO. 116

Valorie Keegan

Response 116-1

The comment states that LAFD should evaluate the cumulative impact of projects in the CPA, including impacts to emergency service, staff, access and response times. The comment also states that Hollywood has PM peak hours with event street closures and some streets have center medians so emergency services vehicles are stuck in traffic. The comment also states that vehicles do not have space to pull over for emergency vehicles at certain busy intersections, and when City Planning and LAFD are reviewing new projects (use, height, density), they should consider first-in fire stations, resources, and staffing.

The comment is noted. Please see **Master Response No. 5 -- Emergency Services**.

Response 116-2

The comment is regarding special event traffic operations and states that street closures are no longer just on Hollywood Boulevard and all events have increased significantly since 2016 with events taking place every day, which can cause traffic to be backed up for at least a one-mile radius and through the neighborhoods. In addition, the comment states that the VMT analysis should include commuters, tourists, and high-volume event traffic.

As explained on page 4.15-24, the description of special events is intended to provide an overview of the various activities that occur in Hollywood to illustrate the robust level of activity and events in the area and is

not meant to be an exhaustive list of all current or potential future events. Many different types of events are described in the EIR that require partial or full closure of city streets, including sidewalks and crosswalks, for periods of several hours to several days at a time. To the extent that special event traffic occurred on a weekday (Tuesday, Wednesday or Thursday) between the months of February and May, these travel demands are accounted for when calculating the average hourly volumes within the Plan Area under Existing Conditions and analyzing roadway operations (Tables 4.15-11 and 4.15-12).

As explained on page 4.15-29, the EIR analyzes VMT as Total Daily VMT per Service Population, which equates to all VMT for the Plan Area divided by the number of people living and working within the Plan Area. The Total Daily VMT per Service Population is the VMT generated by residents, employees, and visitors in Hollywood and captures their travel within Hollywood as well as travel between Hollywood and their ultimate origin/destination, and then divided by the number of people living and working within the Plan Area. VMT per service population showcases the effects of all vehicular movement in an area. It includes not only trips that are attracted and produced by home and work trips, but those that fit in neither category (i.e., school to grocery store, or visitors) as well as truck trips. It is therefore more representative of the effect of users and trips on the roadways in the Plan Area when compared to common household or employment generated VMT metrics. Please also see **Master Response No. 8 – Transportation & Traffic**. See also **Response 48-4** related to the secondary effects of congestion from the Proposed Plan related to special events and emergency access impacts.

Response 116-3

The comment is stating that film-related events should pertain to actual filming and not activities associated with filming such as movie premieres.

Please see **Response 115-3**.

Response 116-4

The comment requests that streets between Sunset Boulevard and Fountain Avenue from La Brea Avenue to Fairfax Avenue be included in the Neighborhood Protection Plan. The comment states that commuter cut-through traffic has increased substantially since 2016, impacting local streets and neighborhoods, and ride share and delivery vehicles have increased traffic too. The comment also states that Nichols Canyon is not identified on maps but is used by commuters.

The Neighborhood Protection Program contained in the Project List in Table 4.15-7 provides a broad overview of the types of improvements that could be implemented to protect residential roadways in the Plan Area. Specific roadway segments and neighborhoods will be considered over time as new development projects are reviewed by the City and transportation network improvements are implemented that may result in traffic diversions. Showing or not showing a street label in the Plan Area is a mapping exercise and does not change the functionality of that street. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 116-5

The comment states that parking is needed in mixed-use buildings for employees, customers, and delivery vehicles and that the secondary effects related to parking already impact the area. In addition, the comment states that local residents that drive to shop need to be included in the VMT analysis. The comment requests a Reduced TOC and alternative because most areas around the rail stops are already built and the remaining bus stops do not provide fixed-route service and therefore may change over time.

As discussed on pages 4.15-41 through 4.15-43, parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA; however, parking deficits may result in secondary physical environmental impacts, such as air quality, safety, or noise impacts caused by drivers

seeking parking. While the Plan could result in a loss of on-street parking spaces, the Plan also has a variety of policies and programs related to parking, such as improving the utilization and management of the existing public parking supply through shared parking opportunities and other strategies (See Goal M.6 and related parking management policies in Chapter 6: Mobility and Connectivity of the Draft Community Plan; associated implementation programs can be found in Chapter 7). Please see **Response 116-2** regarding VMT analysis. One of the Proposed Plan's alternatives is a reduced alternative (Alternative 2: Reduced TOD and Corridors). Alternative 2 would reduce development potential near selected rail stations and corridors served by bus lines; see Chapter 5.0, Alternatives for more information. The comment does not provide sufficient information on what a reduced TOC alternative would involve nor how it could change the conclusions of the impacts. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 116-6

The comment states that parking space for scooters should also be included in addition to new development providing on-site parking for bicycles.

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

Response 116-7

The comment states that the Plan Area has seen tremendous development increases since 2016 and that cumulative impacts need to be considered, and that the impacts from new development already under construction will not be known until the development becomes fully operational in a few years. The comment also states that less than significant conclusions just does not work.

Cumulative impacts are considered and discussed on pages 4.15-60 and 4.15-61, which state that the growth projected by the SCAG, and the growth anticipated by the Proposed Plan are both included. The comment does not provide evidence that would change the less than significant impacts concluded in Section 4.15, Transportation and Traffic. No further response is required because the comment does not raise any new significant environmental issues.

Response 116-8

The comment states that new development should have setbacks to allow pedestrian access and provide adequate visibility for drivers exiting parking garages. In addition, the comment states that intersections become more dangerous when there is too much new development and that TOC areas should be reduced in Hollywood because the half-mile and one-mile radius used is not realistic.

Impact 4.15-3 discusses the potential impacts resulting from hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses. The Plan describes the reasonably expected future development for a portion of the City and does not constitute a commitment to any project-specific development, introduce new streets or otherwise change the overall land use pattern within the Project Area. The Draft Community Plan contains numerous policies and programs that emphasize transportation safety for all people using the transportation system, support implementation of the transportation treatments that are designed to improve roadway safety and help implement other City initiatives which aim to improve the safety of the City's transportation facilities. Furthermore, the design standards in the Proposed Plan are intended to limit the number, width, and location of new driveways along major streets and in areas of high pedestrian activity, thereby improving pedestrian safety. In addition, LADOT must review and approve all driveway dimensions, project access, and circulation plans for new developments. Driveways must comply with LADOT's Driveways Standard Plan S-440-4, which can be found online: http://eng2.lacity.org/techdocs/stdplans/s-400/S-440-4.pdf.

As discussed on page 4.15-43, the implementation of bicycle and pedestrian facilities identified in the Plan and Project List are anticipated to improve the safety of bicyclists and pedestrians. Automobile speed is a major factor in the severity of collisions with bicyclists and pedestrians, the most vulnerable roadway users. Collisions with a vehicle traveling at 20 miles per hour (mph) result in a five percent pedestrian fatality rate, and fatalities increase to 40, 80 and 100 percent when the vehicle speed increases to 30, 40 and 50 mph, respectively. The comment does not provide any substantial evidence as to how the Plan would result in safety impacts. The comment also does not provide any evidence as to how the half-mile and one-mile radius used for TOC is not realistic. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR.

Response 116-9

The commenter provides various comments related to Emergency Access Impacts Associated with Roadway Congestion on page 4.15-55 of the RDEIR. The comment states that sudden evacuations for brush fires can occur, and the Hollywood Bowl, the Ford Theater, and Yamashiro could be evacuated in addition to hillside residents. The comment states that LAFD has evacuation maps but severely congested streets, panicked people, tourists, and wildfires bring on a whole new element. The comment states that planners must be mindful of increasing density and intensity along the foothills, which already have heavily traveled intersections. The comment states that Alternative 2 would benefit the Plan and public safety. The comment also states that fire stations with fire danger hillsides coverage areas require more time to respond, and not all fire stations in Hollywood have a ladder track, therefore increased building heights need to be better evaluated.

The comment is noted. Please see **Master Response No. 5 -- Emergency Services**.

Response 116-10

Similar to Comment 115-1, the comment states the information provided in Table 4.15-5 on page 4.15-19 of the Recirculated Draft EIR regarding Fire Station 41 is incorrect and that this station only has a staff six and has an Engine Company and an Ambulance Unit, not a Truck Company.

Please refer to **Response 115-1** and Final EIR **Chapter 4.0, Corrections and Additions**.

Response 116-11

The comment states that driveways providing access to structures with no setbacks are dangerous to pedestrians due to poor visibility for drivers exiting directly onto the public sidewalk. In addition, the comment requests that driveway access and truck loading areas should be set back by 10 feet from the public right-of-way to provide adequate pedestrian visibility and safety.

The comment is noted. LADOT must review and approve all driveway dimensions, project access, and circulation plans for new developments. Driveways must comply with LADOT's Driveways Standard Plan S-440-4, which can be found online: http://eng2.lacity.org/techdocs/stdplans/s-400/S-440-4.pdf.

Please also see **Response 116-8**.

Response 116-12

The comment states that Alternative 2 (Reduced TOD and Corridors Alternative) should be incorporated by the Plan, and is the environmentally superior alternative. The comment also states that Hollywood needs an environmentally superior Plan and new development under construction and entitled projects are already creating issues, such as height incompatibility (TOC projects), noise, loss of privacy, night-time lighting, and glare. The comment also states that Alternative 2 would be better for emergency responders on La Brea, Sunset, and Santa Monica.

The comment is noted. No further response is required because the comment does not provide any substantial evidence of new or additional significant environmental issues or address the adequacy of the environmental analysis or conclusions included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

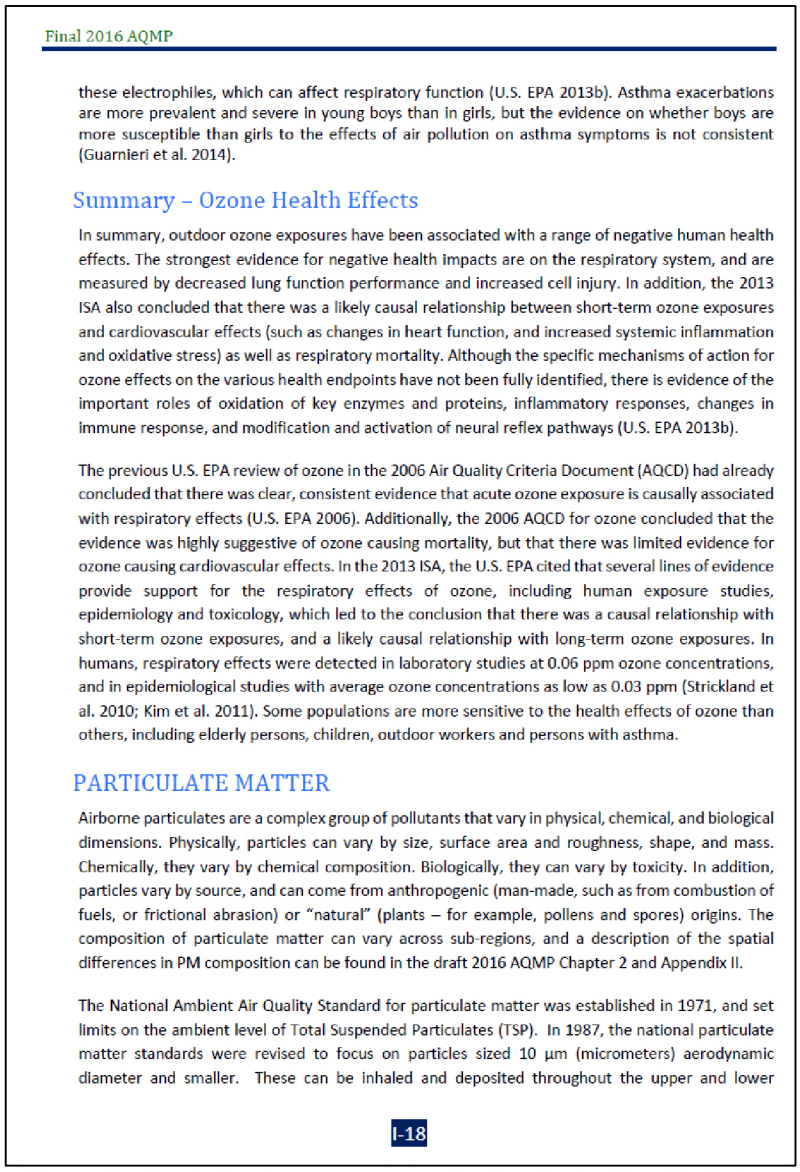
Response 116-13

The comment suggests that additional information should be included in Attachment 1 (SCAQMD 2016 AQMP Appendix I: Health Effects) to Appendix N, Air Quality and Health Effects related to:

- particulate matter emissions from building and concrete demolition,
- possible reductions in carbon sequestration resulting from mature tree removal during land use redevelopment and the potential for exacerbating the urban heat island effect from reduced tree cover that would impede efforts to adapt to climate change, and
- potential limitations in stormwater capture opportunities due to reduced setback and open space.

This comment refers to information contained in a technical appendix and the SCAQMD 2016 AQMP appendix pertaining to Health Effects that is included as an attachment. Appendix N to the EIR developed with input from industry experts and contains information to support the EIR analyses. Appendix N contains multiple secondary appendices including Attachment 1, which is Appendix I Health Effects from the 2016 AQMP prepared by the SCAQMD (see Exhibit below). Appendix I was taken directly from the SCAQMD AQMP and cannot be edited by the City. The commenter has not identified a potential impact as a result of implementing the Proposed Plan and thus the comment does not raise any new significant environmental issues. The commenter does not provide any substantial evidence that supports new or different analysis.

Exhibit: Excerpt from SCAQMD 2016 AQMP Appendix I



Final 2016 AQMP

these electrophiles, which can affect respiratory function (U.S. EPA 2013b). Asthma exacerbations are more prevalent and severe in young boys than in girls, but the evidence on whether boys are more susceptible than girls to the effects of air pollution on asthma symptoms is not consistent (Guarnieri et al. 2014).

Summary – Ozone Health Effects

In summary, outdoor ozone exposures have been associated with a range of negative human health effects. The strongest evidence for negative health impacts are on the respiratory system, and are measured by decreased lung function performance and increased cell injury. In addition, the 2013 ISA also concluded that there was a likely causal relationship between short-term ozone exposures and cardiovascular effects (such as changes in heart function, and increased systemic inflammation and oxidative stress) as well as respiratory mortality. Although the specific mechanisms of action for ozone effects on the various health endpoints have not been fully identified, there is evidence of the important roles of oxidation of key enzymes and proteins, inflammatory responses, changes in immune response, and modification and activation of neural reflex pathways (U.S. EPA 2013b).

The previous U.S. EPA review of ozone in the 2006 Air Quality Criteria Document (AQCD) had already concluded that there was clear, consistent evidence that acute ozone exposure is causally associated with respiratory effects (U.S. EPA 2006). Additionally, the 2006 AQCD for ozone concluded that the evidence was highly suggestive of ozone causing mortality, but that there was limited evidence for ozone causing cardiovascular effects. In the 2013 ISA, the U.S. EPA cited that several lines of evidence provide support for the respiratory effects of ozone, including human exposure studies, epidemiology and toxicology, which led to the conclusion that there was a causal relationship with short-term ozone exposures, and a likely causal relationship with long-term ozone exposures. In humans, respiratory effects were detected in laboratory studies at 0.06 ppm ozone concentrations, and in epidemiological studies with average ozone concentrations as low as 0.03 ppm (Strickland et al. 2010; Kim et al. 2011). Some populations are more sensitive to the health effects of ozone than others, including elderly persons, children, outdoor workers and persons with asthma.

PARTICULATE MATTER

Airborne particulates are a complex group of pollutants that vary in physical, chemical, and biological dimensions. Physically, particles can vary by size, surface area and roughness, shape, and mass. Chemically, they vary by chemical composition. Biologically, they can vary by toxicity. In addition, particles vary by source, and can come from anthropogenic (man-made, such as from combustion of fuels, or frictional abrasion) or "natural" (plants – for example, pollens and spores) origins. The composition of particulate matter can vary across sub-regions, and a description of the spatial differences in PM composition can be found in the draft 2016 AQMP Chapter 2 and Appendix II.

The National Ambient Air Quality Standard for particulate matter was established in 1971, and set limits on the ambient level of Total Suspended Particulates (TSP). In 1987, the national particulate matter standards were revised to focus on particles sized 10 µm (micrometers) aerodynamic diameter and smaller. These can be inhaled and deposited throughout the upper and lower

I-18

Regarding particulate matter emissions from demolition activities and possible health effects, Section 4.3, Air Quality, of the EIR provides an overview of health effects at the programmatic level associated with exposures to criteria air pollutants, ozone precursors, and toxic air contaminants (specifically particulate matter on page 4.3-2), addresses construction-related fugitive dust emissions that would be generated during demolition activities under Impact 4.3-2, and also discusses how fugitive dust emissions during construction activities would be minimized through compliance with SCAQMD Rule 403. Furthermore, the SCAQMD rules outlined in the EIR were not exhaustive, and as part of SCAQMD rule compliance all individual land use projects developed within the HCP under the Proposed Plan/Project that involve demolition activities would be required to comply with Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Conducting building material surveys prior to demolition activities and ensuring that Asbestos-Containing Materials (ACMs) are identified and removed using proper procedures would reduce potential exposures to nearby sensitive receptors. The commenter does not provide any substantial evidence that particulate matter emissions from construction activities and possible adverse health effects were not adequately analyzed and disclosed in the EIR. No further analysis of air quality health effects from demolition emissions is warranted.

Regarding the urban island effect and stormwater capture, effects of climate change are discussed in Section 4.7, Greenhouse Gas Emissions, of the EIR, where it is also stated that the loss of mature trees may contribute to an increased heat island effect and exacerbate the effects of climate change. It is not possible to determine at this programmatic level the number and/or location of trees that could be removed in the Plan Area. The City's regulations for protecting and, if necessary, replacing mature trees is discussed in Section 4.4, Biological Resources, of the EIR. The City of Los Angeles passed an ordinance for the Preservation of Protected Trees (Ordinance No. 177,404) which became law on April 23, 2006. This Ordinance applies to protected trees that are located on public and private properties. And protects all native Oak tree species (*Quercus spp*), Western or California Sycamore (*Platanus racemosa*), California Bay (*Umbellularia californica*), and Southern California Black Walnut (*Juglans californica*). This Ordinance applies to trees that are four inches or greater in diameter at 4.5 feet above ground, and on any lot size. In 2021, the City added the Toyon and Mexican Elderberry shrubs to the list of protected trees and updated protected tree regulations (Ordinance 186873).

The City's Ordinance requires that a permittee replace a protected tree approved for removal or relocation "within the property by at least two trees of a protected variety." Section 46.02(c)1 further states, "each replacement tree shall be at least a 15-gallon, or larger, specimen in size, measuring one inch or more in diameter one foot above the base, and be not less than seven feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced." Street trees are also protected by City Ordinance and require a permit to remove. Discretionary projects may have to replace non-protected trees of a certain size on a 1:1 ratio as part of the conditions of approval. Thus, potential climate change effects related to the urban heat island effect and mature tree removal were addressed at an appropriate level in the EIR. The commenter has not provided substantial evidence demonstrating that new or different analyses would result in the determination of a potentially significant environmental impact related to climate change due to the urban heat island effect, mature tree removal, or impervious surfaces resulting in reduced stormwater capture.

Response 116-14

The comment provides information related to exposure to contaminants such as asbestos and lead. The comment also provides information related to preserving historic buildings as a method of reducing carbon emissions associated with new construction.

Federal, State, and local agencies have strict regulations related to controlling exposure to asbestos and lead. For example, as discussed on page 4.8-8 in Section 4.8, Hazards and Hazardous Materials, of the EIR, SCAQMD Rule 1403 governs work practice requirements for asbestos in all renovation and demolition activities. The purpose of the rule is to protect the health and safety of the public by limiting dangerous emissions from the removal and associated disturbance of Asbestos-Containing Materials (ACM). The current version of the rule, as amended by the SCAQMD Governing Board on October 5, 2007, includes requirements for asbestos surveying, notifications, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and the storage, disposal, and landfilling requirements for resulting waste materials. All operators are also required to maintain records, including waste shipment records, and must use appropriate warning labels, signs, and markings.

GHG emissions are discussed comprehensively in Section 4.7, Greenhouse Gas Emissions, of the EIR. Occupying existing buildings rather demolishing and constructing new buildings could reduce emissions associated with construction activities. However, the analysis is not so straightforward. In some cases, historic buildings may be older and inefficient and newer construction would generally be more efficient and could enable reductions in VMT by accommodating more people closer to transit and/or activity centers.

The commenter has not provided any substantial evidence that contradicts the EIR analysis or conclusions or supports the need for new analysis. No further response is necessary.

Response 116-15

The comment requests several corrections and/or additions to text descriptions and information in Table 4.15-5 in the EIR. The requests include correcting or updating the distance stated between Hollywood and Downtown Los Angeles, the description of the roadway network, reference to a speed limit, reference to a sidewalk width, and apparatus and staffing for Fire Station No. 41.

Regarding the description of the 2.5-mile distance between the Plan Area and Downtown Los Angeles, the mileage is referring to the distance from the eastern edge of the Plan Area to the western edge of Downtown Los Angeles; the 6.5-mile distance mentioned by the commenter is accurate when measuring from approximately the mid-point of both areas.

The description of the roadway network on page 4.15-10 is intended to provide a high-level overview of the Plan Area. There is a small portion of the Plan Area in which Franklin Road terminates and the hillside roadways begin north of Hollywood Boulevard and Sunset Boulevard (west of North Curson Avenue). Regarding the description of Sunset Boulevard as an Avenue I and Hollywood Boulevard as an Avenue II, the roadway designations are intended to describe the general characteristics and operations of the current roadways in the Plan Area. In some cases, the definition of an Avenue I or Avenue II may not match every design feature of the roadway but still represents the most appropriate roadway designation. The comment states that an Avenue I has an operating speed of 35 mph whereas the posted speed limit on Sunset Boulevard is 30 mph. The Avenue II definition states a typical sidewalk width of 15 week, which is correct, but the comment notes that on Hollywood Boulevard, the sidewalk width is about 5 feet in the residential area west of La Brea Avenue. Regarding Fire Station No. 41, please see **Response 115-1**. These comments do not affect the environmental impact conclusions discussed in the EIR. Please see **Master Response No. 1 – General Comments and Non-CEQA Issues**.

LETTER NO. 117

Scott Morgan, Director
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95812

Response 117-1

The comment acknowledges that the RDEIR complies with the State Clearinghouse review requirements for draft environmental documents pursuant to the CEQA, and no state agencies submitted comments by the close of the review period (12/16/2019).

The comment is noted. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the EIR. See **Master Response No. 1 - General Comments and Non-CEQA Issues**.

4.0 CORRECTIONS AND ADDITIONS

As required by California Environmental Quality Act (CEQA) Guidelines Section 15088, this chapter provides corrections or clarifications of certain statements in the Draft Environmental Impact Report (EIR). The correction(s) and/or addition(s) do not constitute significant new information, as defined by CEQA Guidelines Section 15088.5 as they would not result in new significant impacts or a substantial increase in the severity of any impact already identified in the Draft EIR. New information is not significant unless the Draft EIR is changing in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the City has declined to implement.

4.1 CORRECTIONS AND ADDITIONS TO THE DRAFT EIR AND RECIRCULATED DRAFT EIR

Corrections or information has been added to the Draft EIR and Recirculated Draft EIR (RDEIR) pursuant to CEQA Guidelines Section 15132, as part of the preparation of the Final EIR. Additions to the text of the Draft EIR and RDEIR are shown by underline and deletions to the text of the Draft EIR and RDEIR are shown by ~~strikethrough~~ unless otherwise described. The following corrections and additions make minor modifications herein and have not been found to affect the impact analysis or conclusions in the Draft EIR.

CHAPTER 2.0 SUMMARY

Page 2-4 – Revise the Transportation and Traffic environmental impact categories to be consistent with the Recirculated Draft EIR

- **Transportation and Traffic.** ~~Changes in traffic conditions, and c~~Consistency with adopted policies, plans, and programs addressing the circulation system including transit, roadways, bicycle and pedestrian facilities; conflict with CEQA Guidelines related to VMT; increase hazards due to geometric design; result in inadequate emergency access.

Page 2-10 – Revise Mitigation Measure **AQ-1** in Table 2-2 as follows:

AQ-1 The City shall require all projects that are in a CPIO District subarea or are discretionary to include in the agreements with contractors and subcontractors the following, or equivalent, best management practices in contract specifications:

- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of NO_X and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the on-site air quality construction mitigation manager that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" for the following, as well as other, reasons:
- There is no available retrofit control device that has been verified by either the CARB or USEPA to control the engine in question to Tier 3;
- The construction equipment is intended to be on site for five days or less; or
- Relief may otherwise be granted from this requirement if a good faith effort has been made to comply with this requirement and that compliance is not practical for technical, legal, economic, or other reasons.

- All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible, or solar where available.
- Construction contractors shall use prepainted construction materials, as feasible.
- Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible.
- Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
- Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM_{10} generation.

Page 2-11 – Revise Mitigation Measure **BR-1** in Table 2-2 as follows:

BR-1 For discretionary projects that are in or within 200 feet of Griffith Park, dedicated open space or are required to comply with the City's Baseline Hillside Ordinance, project applicants shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of proposed project on wildlife corridors and wildlife movement across the property or within the property vicinity. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. Survey times should correspond with the most likely time the potential species would be observed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. The biological resources assessment report will document the potential for the sensitive species to occur on the site. If sensitive species and/or habitat are absent from or there is no suitable habitat to support the sensitive species on the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to issuance of a grading permit~~, and the project may proceed without any further biological investigation~~.

If sensitive species and/or habitat are identified, the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and CDFW prior to any ground-disturbing activities. A follow-up

report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall also be submitted to DCP and CDFW following construction.

Page 2-14 – Revise Mitigation Measure **BR-3** in Table 2-2 as follows:

BR-3 During environmental review for projects that are discretionary or in a CPIO District subarea, in areas potentially containing jurisdictional waters or ~~and~~ riparian habitat, including streams, wetlands, ~~riparian habitat,~~ and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project shall be surveyed by a qualified biologist for Waters of the U.S. and Waters of the State (e.g., streams, wetlands, or riparian habitat). Whenever possible, individual projects shall be designed and/or sited to avoid disturbance to or loss of jurisdictional resources. If Waters of the U.S. or Waters of the State cannot be avoided and would be affected by the individual project, the regulatory agencies shall be consulted regarding the required permits. Individual project applicants shall demonstrate to DCP, if the lead agency, the regulating agency that the requirements of agencies with jurisdiction over the subject resource can be met prior to obtaining grading permits. This will include, but not be limited to, consultation with those agencies, securing the appropriate permits, waivers, or agreements, and arrangements with a local or regional mitigation bank including in lieu fees, as needed.

Page 2-17 – Revise Mitigation Measure **BR-6** in Table 2-2 as follows:

BR-6 For discretionary projects that are in or within 200 feet of Griffith Park, dedicated open space or are required to comply with the City's Baseline Hillside Ordinance, the biological resources assessment report, as mentioned in Mitigation Measure **BR-1**, shall analyze how the individual development project could affect wildlife corridors and wildlife movement. The biological resources assessment report shall include a biological constraints analysis that ~~The report~~ shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely ~~closed~~ obstructed from wildlife passage by ~~any development or improvements occurring within the Project Area~~ the discretionary project. Measures to support wildlife movement include but are not limited to: retention of onsite native trees and vegetation, or unobstructed setbacks or wildlife friendly fencing on at least two edges of the property, or minimum 25-foot buffers from the edge of stream, reservoir, riparian or wetland habitat.

Page 2-18 – Revise Mitigation Measure **CR1** in Table 2-2 as follows:

CR1 For all discretionary projects or projects in a CPIO District Subarea, that involve disturbance of previously undisturbed soils, a qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological materials or associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist.

Page 2-33 – Revise the first row, fourth column in Table 2-2 as follows:

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
Hazardous Materials Sites	**Impact 4.8-4**: Would development under the Proposed Plan be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result has the potential to create a significant hazard to the public or the environment?	Potentially Significant	Refer to Mitigation Measure **HM1** and **HM2**.	Less than Significant

Page 2-42 through 2-44 – Replace the Transportation & Traffic rows in Table 2-2 to reflect the new CEQA Guidelines and the City's adopted transportation thresholds presented in the partially RDEIR as follows:

TABLE 2-2: SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES				
TRANSPORTATION & TRAFFIC				
Impact Category	**Checklist Threshold**	**Level of Impact Before Mitigation**	**Mitigation Measure**	**Level of Impact After Mitigation**
Circulation System	**Impact 4.15-1**: Would implementation of the Proposed Plan conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	Less than Significant	No Mitigation Required	Less than Significant
Vehicle Miles Traveled (VMT)	**Impact 4.15-2**: Would implementation of the Proposed Plan conflict with CEQA Guidelines section 15064.3, subdivision (b) related to VMT thresholds?	Less than Significant	No Mitigation Required	Less than Significant
Design Feature Hazards	**Impact 4.15-3**: Would implementation of the Proposed Plan substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses?	Less than Significant	No Mitigation Required	Less than Significant
Emergency Access	**Impact 4.15-4**: Would implementation of the Proposed Plan result in inadequate emergency access?	Less than Significant	No Mitigation Required	Less than Significant

CHAPTER 3.0 PROJECT DESCRIPTION

Page 3-13 – Revise the first paragraph under Section 3.5 as follows:

> The underlying purpose of the Proposed Plan is to plan for and accommodate foreseeable growth in the City ~~Project Area~~, including the Hollywood Community Plan Area, consistent with the growth strategies of the City as provided in the Framework Element, as well as the policies of SB 375 and the SCS.

Page 3-18 – Revise the list of the key components of the Proposed Plan to include the following:

- **Community Plan**. Amendments to the text of the Hollywood Community Plan (the Draft Hollywood Community Plan) that lays out a long-range vision for the development of the Project Area and programs to achieve the vision.
- **Land Use Map**. Amendments to the Hollywood Community Plan land use map. The land use map shows the distribution of land use designations, and the range of zones allowed in each land use designation.
- **Zoning**. Zone changes represented by:
  a) A matrix for the Draft Land Use and Zone Change Maps, which contain information on existing and proposed zoning and land use.
  b) A matrix with details of the Qualified ("Q") Conditions and Development ("D") Limitations.
  c) Amendments to the SNAP Specific Plan.
  d) Adoption of a CPIO District with supplemental development standards, regulations, and procedures.
  e) Ordinance to expand the Hillside Construction Regulation (HCR) Supplemental Use District.
  e) Ordinance to Amend the Hollywood Redevelopment Plan.
- **Mobility Plan.** Amendments to the enhanced networks maps in the Mobility Plan (MP) 2035.
- **Framework Element Map**. Amendment to the Framework Element's "Proposed Centers, Districts and Mixed-Use Boulevards" Maps, related to the distribution of proposed centers, districts and mixed-use boulevards.
- **Fee Study**. A nexus study and identification of potential transportation improvements to be partially funded by impact fees.

CHAPTER 4.0 ENVIRONMENTAL ANALYSIS

Section 4.1 Aesthetics

Page 4.1-1 – Revise the fourth paragraph as follows:

Senate Bill 743 (SB 743) (Environmental Quality). On September 2013, Governor Brown signed into law SB 743, which instituted changes to California Environmental Quality Act (CEQA) when evaluating environmental impacts of projects in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated, it also limited the extent to which aesthetics impacts are evaluated under CEQA Guidelines. SB 743 (Public Resources Code [PRC] Section 21099 (d)(1)) exempts development projects located in Transit Priority Areas (TPAs), from review of aesthetic impacts under CEQA Guidelines. Specifically, this bill provides that aesthetic impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment.[1] However, a lead agency still has the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies, such as the adoption of a land use plan. A TPA is defined as an area within one-half mile of a major transit stop that is existing or planned. Section 21064.3 of the PRC defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[1]Public Resources Code Section 21099(a)(1) defines "employment center project" as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a TPA.

Page 4.1-32 – Revise the second paragraph of the discussion under Impact 4.1-3 as follows:

Within the Project Area, Change Areas would experience the most change in visual character. The Proposed Plan includes an affordable housing incentive program that would replace the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) for properties within the CPIO District subareas. The affordable housing incentives are tailored to the specific CPIO subareas and include increased density, floor area, and height for projects that include the required percentage of onsite affordable housing. The analysis herein has considered potential heights of structures permitted under the TOC Guidelines, which is within the parameters of the affordable housing incentives, which include height incentives, in the Hollywood CPIO. Although Non-Change Areas may be redeveloped with more intense uses or density when allowed by current and proposed land use designations and zoning than what currently exists (e.g., a surface parking lot getting developed with a low-rise office building or a two-story multi-family building replacing a one-story duplex), it is not foreseeable that these Non-Change Areas will experience a significant increase to density, intensity, heights or mix of uses that would affect the visual character of the existing environment. Development or redevelopment in the Non-Change Areas are generally expected to be consistent in size and scale to the surrounding area and would be consistent with the visual character of the area. Future development in these areas would continue to be subject to City zoning regulations and would be guided by policies and the design standards and guidelines associated with the Proposed Plan. As such, significant changes to the visual character in Non-Change Areas are not foreseeable as a result of the Proposed Plan.

Section 4.3 Air Quality

Page 4.3-25 – Table 4.3-10, the following row is added below the row showing whether the Change from Existing Conditions exceeds thresholds:

	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Change from Future No Project/Existing Plan	286	121	231	3	57	12

In addition footnote /b/ in the same table is revised as follows:

/b/ Net emissions refer to the difference in emissions between Proposed Plan and existing conditions; Negative values expressed in parentheses. Change from Future No Project/Existing Plan is shown for informational purposes not for impact analysis.

Page 4.3-28 – Revise the first paragraph as follows:

As indicated above, construction projects with ~~more than~~ eight or more heavy duty pieces of equipment on-site and operating eight hours per day and ~~over~~ 100 or more daily truck trips would be expected to exceed SCAQMD regional thresholds of significance; projects with over eight heavy duty pieces of equipment operating eight hours per day would be expected to exceed SCAQMD LST. As noted above, projects that would require this level of equipment use/truck trips would be expected to be larger than the threshold for site plan review and would require discretionary review.

Section 4.4 Biological Resources

Page 4.4-9 – Add Mountain Lions to Table 4.4-2 as follows:

TABLE 4.4-2: SENSITIVE SPECIES KNOWN TO OCCUR IN THE PROJECT AREA

Scientific Name	Common Name	Habitat	Federal Status /a/	State Status /b/	CDFW /c/	CNPS /d/
Puma concolor	Mountain Lion	Mountain lions can be found wherever deer are present, since deer are a mountain lion's primary food source in most areas. As such, foothills and mountains are considered prime mountain lion habitat.	None	None	SSC	N/A

Page 4.4-3 – After the discussion of California Endangered Species Act (CESA) in the Regulatory Framework heading, add the following:

Southern California/Central Evolutionary Significant Unit (ESU) of Mountain Lion. On April 16, 2020, the California Fish and Game Commission (CFGC) voted to advance the Southern California/Central evolutionary significant unit (ESU) of mountain lion to candidacy under the California Endangered Species Act (CESA). There are six identified imperiled mountain lion populations in the ESU; four populations occur within the SCAG region, and they include: the Santa Monica Mountains lions, the Santa Ana Mountains lions, the San Gabriel/San Bernardino Mountains lions, and the Eastern Peninsular Range lions. All of the populations in the SCAG region are well below that minimum threshold of 50, which indicates that these populations are at serious risk of becoming extirpated.

Proposition 117 - Amendment of the California Wildlife Protection Act of 1990. Proposition 117 repeals mountain lion's status as specially protected mammal and requires Fish and Game Commission to manage mountain lions as it manages mammals that are not rare, endangered, threatened. It requires Fish and Game Department to implement a mountain lion management plan that promotes health, safety, livestock, property protection; identifies priority zones where mountain lion removal has not alleviated threats. It also authorizes taking of mountain lions in priority zones, consistent with plan and permits governmental agencies, landowners to take mountain lions imminently threatening public health, safety, or livestock.

Page 4.4-4 – Revise the second paragraph as follows:

Santa Monica Mountains Conservancy Act. The Santa Monica Mountains Conservancy Act (Public Resources ~~e~~Code Sections 33000 – 33215) was enacted in 1979 by AB 1312. The act declared the Santa Monica Mountains Zone (Zone), which generally is comprised of the Santa Monica Mountains in Los Angeles and Ventura Counties, as a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations. The Santa Monica Mountains portion of the Project Area is located within the Zone. The act recognizes the Zone as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, that provides essential relief from the urban environment and that the Zone is a single ecosystem in which changes that affect one part may also affect all other parts. In addition to defining the Zone, the~~The~~ act established the Santa Monica Mountains Conservancy. The conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public. The conservancy aims to preserve, protect, and enhance the open spaces in the mountains within Los Angeles and Ventura counties with a guiding principle of maintaining a network of cross-freeway habitat linkages

and wildlife corridors that keep the mountain ranges biologically inter-connected and provide enough habitat to support larger mammals.

Page 4.4-7 – Insert the following text to the end of the third paragraph:

Within Griffith Park, natural communities include California bay forest, California brittle brush scrub, California sycamore woodlands, and holly leaf cherry chaparral. The northern part of the park includes coastal sage scrub and valley needlegrass grassland. The park also contains riparian forest ravines. Oak woodlands along drainages transition into chaparral and grassland on the uppermost slopes. North-facing rocky outcrops in the park often have cliffside vegetation of lichens, mosses, liverworts, and flowering plants. Birds rely on these open space islands to rest and feed as they migrate.

Page 4.4-8 – After the last paragraph of the Sensitive Natural Communities and Special Status Species discussion under the Existing Setting heading, add the following:

Within the SCAG region, there are four imperiled mountain lion populations at serious risk of becoming extirpated. The imperiled mountain lion populations include: the Santa Monica Mountains lions, the Santa Ana Mountains lions, the San Gabriel/San Bernardino Mountains lions, and the Eastern Peninsular Range lions. The populations in Santa Monica Mountains are severely constrained and facing an extinction vortex due to high levels of inbreeding, low genetic diversity, and high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires.[2,3,4,5,6]

Page 4.4-13 – Revise the last paragraph as follows:

Generally, ~~Although not officially mapped, it is reasonable to assume there are~~ wildlife corridors are located in the Santa Monica Mountains within and to the west of the Project Area. Most of the wildlife within the Project Area is found within the undeveloped portions of the Santa Monica Mountains. While undeveloped open space area within the Project Area~~, which~~ is predominately located east of US-101 within the Griffith Park SEA, pockets of undeveloped land are also located to the west of US-101, which ~~However, US-101~~ bisects the mountains within the Project Area. The pockets of undeveloped land to the west of US-101 in the Santa Monica Mountains are interspersed between residential neighborhoods. Dense urban development on all other sides of the Santa Monica Mountains prevents wildlife movement between the Santa Monica Mountains and other undeveloped open spaces areas in the vicinity of the Project Area, such as Verdugo Mountains.

West of US-101, wildlife travel on undeveloped open space areas along roadways or between structures to access the pockets of undeveloped open space areas in the Santa Monica Mountains within and to the west of the Project Area. Within the Project Area, the hillside between US-101 and I-5 (including the Griffith Park SEA) is separated from the Santa Monica Mountain Range to the west and from the Los Angeles River along the Project Area's northerly and easterly boundaries. As a result, this area is become increasingly isolated and movement of most non-avian wildlife is restricted. As the Project Area is largely

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[2]Ernest HB, Boyce WM, Bleich VC, May B, Stiver SJ, Torres SG (2003) Genetic structure of mountain lion (Puma concolor) populations in California. Conserv Genet 353–366.

[3]Ernest HB, Vickers TW, Morrison SA, Buchalski MR, Boyce WM (2014) Fractured genetic connectivity threatens a Southern California puma (Puma concolor) population. PLoS One 9: . doi: 10.1371/journal.pone.0107985.

[4]Riley, S. P. D., Serieys, L. E. K., Pollinger, J. P., Sikich, J. A., Dalbeck, L., Wayne, R. K., & Ernest, H. B. (2014). Individual behaviors dominate the dynamics of an urban mountain lion population isolated by roads. Current Biology, 24(17), 1989–1994.

[5]Vickers, T. W., Sanchez, J. N., Johnson, C. K., Morrison, S. A., Botta, R., Smith, T., … Boyce, W. M. (2015). Survival and mortality of pumas (Puma concolor) in a fragmented, urbanizing landscape. PLoS ONE, 10(7), 1–18.

[6]Benson, J. F., Mahoney, P. J., Sikich, J. A., Serieys, L. E. K., Pollinger, J. P., Ernest, H. B., & Riley, S. P. D. (2016). Interactions between demography, genetics, and landscape connectivity increase extinction probability for a small population of large carnivores in a major metropolitan area. Pro*ceedings of the Royal Society B: Biological Sciences*, 283(1837), 20160957.

urbanized, the habitats within the Santa Monica Mountains and Los Angeles River are connected by bridge overpasses spanning US-101 and flood control channels. The bridges over US-101 near the Hollywood Reservoir are used by wildlife to travel between the open space areas to the east and west of US-101. ~~Wildlife movement between these areas is sporadic and unlikely to result in a significant exchange in genetic material or linkage of the Project Area to core habitat areas beyond the limits of the Project Area.~~ Although wildlife movement is generally restricted in the hillside areas between US-101 and I-5, this portion of the Santa Monica Mountains, which includes the Griffith Park SEA, is viewed as an important connective island for the Santa Monica Mountains to the west of US-101, as well as the Verdugo Mountains and San Gabriel Mountains to the east. Wildlife uses natural areas, as well as bridges and concrete channels of the Los Angeles River, to connect to the Tujunga Valley and Hansen Dam SEA and the San Gabriel Mountains. ~~It is reasonable to assume that the bridge over the US-101 near the Hollywood Reservoir is used by wildlife.~~

Page 4.4-16 – Revise the first paragraph under Impact 4.4-1 as follows:

As discussed above, most of the Project Area is developed with urban uses and does not contain or provide habitat that supports candidate, sensitive, or special status species (hereinafter, collectively referred to as special status species). Suitable habitat for wildlife is generally found in undeveloped natural open space areas. The largest majority of the undeveloped natural open space areas within and near the Project Area is located within the Santa Monica Mountains. While undeveloped natural open space areas are primarily located in the Santa Monica Mountains east of US-101, pockets of undeveloped natural open space areas are interspersed between residential neighborhoods in the Santa Monica Mountains west of US-101. Undeveloped natural open space areas within the Santa Monica Mountains include, but are not limited to, the Griffith Park SEA, which encompasses most of Griffith Park; Trebek Open Space; and Runyon Canyon Park. The geographical location of the Griffith Park SEA is important in that it has become an island of natural vegetation surrounded by development, and birds use these island areas to rest and feed along their migration routes. Isolated areas are significant for preserving the geographical variability of vegetation and wildlife that formerly occurred through the region. Species movement that can occur between the Santa Monica and San Gabriel Mountains via the Verdugo Mountains would pass through the Griffith Park SEA. The developed portions of the Santa Monica Mountains can also provide food and shelter for wildlife found in the area. Wildlife species that are typically found in developed areas have adapted to the presence of humans and include, but are not limited to, raccoons, rabbits, skunk, squirrels, coyotes, crows, ravens, and owls. For those species that are sensitive to human activity and habitat disturbance, urban development in the surrounding areas is inhospitable.[12] In addition to the Santa Monica Mountains, a narrow band of willow riparian habitat along the bed of the Los Angeles River near the I-5/SR-134 interchange (within the Project Area) and downstream of Colorado Boulevard (near the Project Area) may support wildlife. These two areas of the Los Angeles River provide a variety of habitats, including for amphibians and nesting habitat for many bird species (see discussion of wildlife habitats under "Existing Setting").

Page 4.4-19 – Before the first complete paragraph under Endangered Plant and Animal Species heading under Impact 4.4-1, add the following:

As discussed in the Regulatory and Existing Setting sections, the California Fish and Game Commission (CFGC) advanced the Southern California/Central Evolutionary Significant Unit (ESU) of mountain lion to candidacy under the California Endangered Species Act (CESA) on April 16, 2020. Candidate species are afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the CFGC. The primary threat to the long-term survival of mountain lions in the Southern California/Central Coast ESU is genetic isolation due to lack of connectivity caused by continuous development in mountain lion habitat with little consideration to their movement needs. Fragmentation of habitat by roads and development leads not only to deaths from vehicle collisions, but also multiple cases of first-order inbreeding because animals are not able to disperse in and out of the area. Genetic analyses indicate that lions in the Santa Monica Mountains, along with a similarly isolated population in the Santa Ana Mountains south of Los Angeles, have the lowest levels of genetic diversity ever documented in the

West. Another major threat to the species is the widespread presence of anticoagulant rodenticides, commonly known as rat poisons, in the environment. Twenty-seven out of 28 mountain lions tested in a recent study tested positive for one or more anticoagulant compounds and six have died from anticoagulant rodenticide poisoning (as of January 2021). Another cause of death for mountain lions is intraspecific strife, or mountain lions killing other mountain lions. Though common in other populations, this rate may be exacerbated by the fact that mountain lions are basically trapped on an island of habitat, surrounded by freeways and the Pacific Ocean.[7] Mountain lions are wide ranging species that have home ranges of 75 to 200 square miles. Thus, the persistence of the four populations with the SCAG region relies heavily on being connected with mountain lions throughout the ESU, including the Santa Monica Mountain lions, as well as statewide. The effective population sizes of the four populations within the SCAG region ranges from 4 to about 32 mountain lions. An effective population size of 50 is assumed to be sufficient to prevent inbreeding depression over five generations, while an effective population size of 500 is considered sufficient to retain evolutionary potential in perpetuity.

Negative edge effects from human activity, traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency have been found to be biologically significant up to 300 meters (~1,000 feet) away from anthropogenic features in terrestrial systems. Therefore, since development and noise in the disturbed and undisturbed open space areas of the Santa Monica Mountains could potentially occur during the lifetime of the Proposed Plan, impacts to the Mountain lion could potentially occur as a result of future development occurring over the lifetime of the Proposed Plan.

Page 4.4-24 – Revise Mitigation Measure **BR-1** as follows:

BR-1 For discretionary projects that are in or within 200 feet of Griffith Park, dedicated open space or are required to comply with the City's Baseline Hillside Ordinance, project applicants shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of proposed project on wildlife corridors and wildlife movement across the property or within the property vicinity. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. Survey times should correspond with the most likely time the potential species would be observed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. The biological resources assessment report will document the potential for the sensitive species to occur on the site. If sensitive species and/or habitat are absent from or there is no suitable habitat to support the sensitive species on the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to Department of City Planning (DCP) prior to issuance of a grading permit~~, and the project may proceed without any further biological investigation~~.

If sensitive species and/or habitat are identified, the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted

[7] https://www.nps.gov/samo/learn/nature/pumapage.htm; accessed July 20, 2021.

until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and CDFW prior to any ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall also be submitted to DCP and CDFW following construction.

Page 4.4-26 – Revise the third paragraph under Impact 4.4-2 as follows:

The Project Area includes the Griffith Park SEA, other undeveloped and minimally developed open space areas within the Santa Monica Mountains (east and west of US-101), and portions of the Los Angeles River. As previously mentioned in Impact 4.4.1, the Proposed Plan does not propose any development in the open space areas, including the Los Angeles River and the Santa Monica Mountains to the east and west of US-101, but such parcels could be developed with structures and improvements that are associated with low density single-family residential and/or recreational uses, depending on the zoning of the affected parcels. It is reasonably foreseeable that undeveloped open space areas in the Project Area (including the Santa Monica Mountains to the east and west of US-101 and other areas of the Project Area that has undeveloped open space) and the function of Griffith Park as a regional-serving park may be disturbed during the lifetime of the Proposed Plan due to the large amount of open space in the Project Area~~, and the function of Griffith Park as a regional-serving park~~. As a result, development during the lifetime of the Proposed Plan could affect the Griffith Park SEA's important role as an island for wildlife movement or the willow riparian habitat along the bed of the Los Angeles River near the I-5/SR-134 interchange and downstream of Colorado Boulevard. The SEA designation does not guarantee preservation and does not protect all riparian habitat and sensitive plant communities that could potentially be found within the Project Area. Through zoning restrictions, development projects within the Project Area would be consistent with the objectives, policies, and programs contained within the City's General Plan Conservation Element to protect sensitive species, which would have direct and indirect beneficial effects for special status species, such as through preserving, protecting, restoring, and enhancing natural plant and wildlife diversity, habitats, corridors, and linkages to enable the healthy propagation and survival of native species. The Proposed Plan would not change the objectives, policies, and programs contained within the City's Conservation Element. However, it is reasonably foreseeable that implementation of the Proposed Plan could impact various habitat types, including riparian habitat and other sensitive plant communities. Therefore, impacts related to riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS are ***potentially significant***.

Page 4.4-27 – Revise Mitigation Measure **BR-3** as follows:

BR-3 During environmental review for projects that are discretionary or in a CPIO District subarea, in areas potentially containing jurisdictional waters or ~~and~~ riparian habitat, including streams, wetlands, ~~riparian habitat,~~ and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project shall be surveyed by a qualified biologist for Waters of the U.S. and Waters of the State (e.g., streams, wetlands, or riparian habitat). Whenever possible, individual projects shall be designed and/or sited to avoid disturbance to or loss of jurisdictional resources. If Waters of the U.S. or Waters of the State cannot be avoided and would be affected by the individual project, the regulatory agencies shall be consulted regarding the required permits. Individual project applicants shall demonstrate to DCP, if the lead agency, the regulating agency that the requirements of agencies with jurisdiction over the subject resource can be met prior to obtaining grading permits. This will include, but not be limited to, consultation with those agencies, securing the appropriate permits, waivers, or agreements, and arrangements with a local or regional mitigation bank including in lieu fees, as needed.

Page 4.4-29 – Revise the first paragraph under Impact 4.4-4 as follows:

Undisturbed natural open space within and surrounding the Project Area is predominately found within the Santa Monica Mountains. The Santa Monica Mountains within and in the vicinity of the Project Area are part of a larger wildlife corridor encompassing the Santa Monica Mountain Range. They are also an important stopover for migrating and nesting birds and provides habitat for wintering and nesting birds. The Los Angeles River near the I-5/SR-134 interchange (which is within the Project Area) and downstream of Colorado Boulevard (which is in the vicinity of the Project Area) contains riparian species and is also a stopping point for migrating birds. Within the Project Area, pockets of undeveloped open space areas are interspersed between residential neighborhoods west of US-101. Additionally, the Santa Monica Mountain between US-101 and I-5 is separated from the rest of the Santa Monica Mountain Range to the west and from the Los Angeles River along its northern and eastern boundaries. As a result, movement of most of the animals and plants found within this area is restricted. As the Project Area is largely urbanized, the habitats within the Santa Monica Mountains and Los Angeles River are connected by bridge overpasses spanning US-101 and flood control channels. While wildlife may cross at the bridges over the US-101 near the Hollywood Reservoir, wildlife movement is generally restricted in the Santa Monica Mountains between US-101 and I-5 (except for bird species), which includes the Griffith Park SEA. However, this area is viewed as an important connective island for the Santa Monica Mountains to the west of US-101, as well as the Verdugo Mountains and San Gabriel Mountains to the east. Wildlife may also use the natural areas, as well as bridges and concrete channels of the Los Angeles River, to connect to the Tujunga Valley and Hansen Dam SEA and the San Gabriel Mountains.

Page 4.4-30 – Revise Mitigation Measure **BR-6** as follows:

BR-6 For discretionary projects that are in or within 200 feet of Griffith Park, dedicated open space or are required to comply with the City's Baseline Hillside Ordinance, the biological resources assessment report, as mentioned in Mitigation Measure **BR-1**, shall analyze how the individual development project could affect wildlife corridors and wildlife movement. The biological resources assessment report shall include a biological constraints analysis that ~~The report~~ shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely ~~closed~~ obstructed from wildlife passage by ~~any development or improvements occurring within the Project Area~~ the discretionary project. Measures to support wildlife movement include but are not limited to: retention of onsite native trees and vegetation, or unobstructed setbacks or wildlife friendly fencing on at least two edges of the property, or minimum 25-foot buffers from the edge of stream, reservoir, riparian or wetland habitat.

Section 4.4 Cultural Resources

Page 4.5-1 – Revise a portion of the introductory paragraph as follows:

This section was prepared utilizing information from a variety of sources, including the SurveyLA Historic Resources Survey Report prepared for the Hollywood Community Plan Area (CPA) by the Historic Resources Group in August 2011 and revised in November 2015, the Historic Resources Inventory (HRI) provided by the California Office of Historic Preservation, Historic Cultural Monument (HCM) and Historic Preservation Overlay Zone (HPOZ) provided by the Los Angeles Office of Historic Resources (OHR), and the Historic Resources Survey for the Hollywood Redevelopment Project Area prepared by Chattel Architecture, Planning & Preservation, Inc. in February 2010.

Page 4.5-8 – Update the description of the City of Los Angeles Historic Preservation Overlay Zone Ordinance (LAMC 12.20.3) as follows:

City of Los Angeles Historic Preservation Overlay Zone Ordinance (LAMC 12.20.3). The City's Historic Preservation Overlay Zone (HPOZ) Ordinance was first adopted by the Los Angeles City Council in 1979 and has since been amended several times. The most recent iteration of City of Los Angeles Ordinance Number ~~175891~~184903, found in Section 12.20.3 of the LAMC, describes the procedures for ~~creation~~ the establishment of new Historic Preservation Overlay Zones (HPOZs), the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs. This Ordinance was adopted by the Los Angeles City Council on ~~March 19~~ April 25, ~~2004~~ 2017 and became effective on ~~May~~ June 17~~2~~, ~~2004~~ 2017. This Ordinance is intended to recognize, preserve, use, and enhance buildings, structures, landscaping, natural features, and areas within the City having historic, architectural, cultural or aesthetic significance in the interest of the health, economic prosperity, cultural enrichment and general welfare of the people. ~~This Ordinance describes the procedures for the creation of new HPOZs, the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs.~~ Sites within an HPOZ are categorized in one of two ways - contributing elements and non-contributing elements; see Impact 4.5-1 for more information.

As required by this ordinance, the construction, addition, demolition, reconstruction, alteration, removal, or relocation of any publicly or privately-owned building, structure, landscaping, natural feature, lot, street features, furniture or fixtures within a HPOZ identified as either a contributing element or a non-contributing element in the historical resources survey for the zone must obtain ~~a Certificate of Appropriateness~~ an approval by the Director of the City's Department of City Planning (DCP) or Area Planning Commission. Depending on the scope of a project an application may be reviewed through a ministerial process Conforming Work for a Contributing Element or Conforming Work for Non-Contributing Element; or through a discretionary process Certificate of Appropriateness or Certificate of Compatibility. The determination to approve, conditionally approve or disapprove of a ~~Certificate of Appropriateness~~ a project ~~for construction, addition, alteration or reconstruction~~ is based on the project's conformance to the HPOZ's Preservation Plan, and if no Preservation Plan exists, compliance with the United States Secretary of Interior's Standards of Rehabilitation, ~~if no Preservation Plan exists,~~ and whether the project protects and preserves the historic and architectural qualities and the physical characteristics which make the building, structure, landscape, or natural feature a contributing element of the preservation zone. Any person proposing to demolish, remove or relocate any contributing building, structure, landscaping, or natural feature within a preservation zone not qualifying as conforming work on contributing elements shall apply for a Certificate of Appropriateness and must conduct appropriate environmental review. No Certificate of Appropriateness shall be issued to demolish, remove or relocate any building, structure, landscaping, natural feature or lot within a HPOZ that is designated as a contributing element unless it can be demonstrated that the owner would be deprived of all economically viable use of the property.

Page 4.5-32 – Add additional information about Survey LA as follows:

SurveyLA

SurveyLA is a citywide survey that identifies and evaluates individual resources (such as buildings, structures, objects), non-parcel resources (such as natural features, landscapes, and public art), and historic districts for eligibility for listing in the National Register, California Register, and local designation as an HCM or HPOZ. The survey also identifies planning districts which are areas that are not eligible for historic designation but have consistent development patterns or building themes. The survey covers the period from approximately 1850 to 1980. Significant resources reflect important themes in the city's growth and development in various areas, including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others.

Page 4.5-33 – Clarify the reference to the 7RQ California Historical Resource (CHR) Status Code as follows:

~~This~~ The 7RQ status code is used to identify properties that were considered during the field survey process but were not recorded as significant based on the following: 1) field observations regarding the overall quality of the resource and alterations and/or 2) no preloaded information relating to the social, cultural or historical significance of the resource was obtained through SurveyLA research or the Public Participation and Outreach Program. A 7RQ status code does not preclude that a resource may be found to be significant with additional research, new information, and analysis.

Page 4.5-46 – Update description of the Hollywood CPIO District. Amend the second paragraph on Page 4.5-46 in Impact 4.5-1 as follows:

The Proposed Plan also includes other components intended to assist in protecting historical resources. The proposed Community Plan Implementation Overlay (CPIO) District implements the goals and policies of the Hollywood Community Plan Update by fostering affordable housing, promoting the preservation and rehabilitation of identified historic resources, and designing for walk-ability and high quality building design. The CPIO's boundaries are within central Hollywood and ~~that~~ generally follow Franklin Avenue to the north, the 101 Freeway to the east, Melrose ~~Fountain~~ Avenue to the south and La Cienega ~~Brea~~ Avenue to the west but it does not encompass the entire area within these boundaries. See the CPIO boundaries in updated Appendix E – Updated Proposed CPIO attached to the Final EIR. The CPIO has four types of subareas: Regional Center, Corridors, Multi-family Residential, and Character Residential. The CPIO applies historic review ~~includes~~ regulatory protections for both residential and commercially zoned properties ~~with designated or eligible~~ historical resources~~, including demolition delay for all buildings or structures that are 45 years or older. The CPIO would also restrict applicants from obtaining a demolition permit without an approved replacement project and require that renovation of designated resources comply with the Secretary of the Interior's Standards. Demolition delay allows time for further consideration of a resource as well as efforts to nominate a resource as an HCM and potentially seek alternatives to demolition. But ultimately demolition delay does not prohibit a resource from being demolished~~.

Page 4.5-48 – Add a reference to the CPIO District as follows:

While the Office of Historic Resources reports that it is extremely uncommon in the City to lose designated historical resources when a property owner has complied with the City's regulations, the Cultural Heritage Ordinance and the HPOZ Ordinance cannot prevent a property from being demolished or redeveloped or prevent structures from being altered. Rather these ordinances provide for processes, including environmental review, but they do not prohibit demolition. Therefore, even though the Proposed Plan incorporates changes, such as the CPIO District, that would assist in further protecting both designated and eligible historical resources, it is possible that demolition and/or significant alteration to some of the hundreds of historical resources within the Project Area would occur during the life of the Proposed Plan. Therefore, the Proposed Plan's impacts related to historical resources would be ***potentially significant***.

Page 4.5-49 – Revise Mitigation Measure **CR1** as follows:

CR1 For all discretionary projects or projects in a CPIO District Subarea, that involve disturbance of previously undisturbed soils, a qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section

21083.2. Personnel of the project shall not collect or move any archaeological materials or associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist.

Page 4.5-57 – Revise the paragraph under Historical Resources in the Cumulative Impacts discussion to add a reference to the Hollywood CPIO District as follows:

HISTORICAL RESOURCES

As discussed above, it is possible that future development within the Project Area could result in demolition and/or significant alteration to some of the hundreds of historical resources during the life of the Proposed Plan. Implementation of the Proposed Plan in combination with other projects located throughout the City of Los Angeles would similarly increase the potential for impacts to historical resources and could contribute to the loss of historical resources in the City. The Cultural Heritage Ordinance, the HPOZ Ordinance, and the proposed Hollywood CPIO District cannot prevent a property from being impacted by demolition or redevelopment or prevent structures from being altered so long as an applicant has gone through all necessary processes, including environmental review. These losses are anticipated to be significant throughout the City and region as a result of reasonably foreseeable development from the Proposed Plan and from previously approved projects but not constructed in the Plan area, as well as reasonably foreseeable development and previously approved but not built projects in the County and surrounding Community Plan areas. As discussed above, there is no identified feasible mitigation measure to protect historical resources within the Plan Area and for the same reasons there is no identified feasible mitigation measures outside the Plan Area to avoid cumulative impacts and the Proposed Plan would result in significant impacts and cumulatively considerable contributions to significant cumulative impacts.

Section 4.6 Geology and Soils

Page 4.6-5 – After the 1st paragraph following Table 4.6-1 under the Existing Setting heading, add the following:

In May and June 2018, the U.S. Geological Survey (USGS) and the California Geological Survey (CGS) jointly conducted a series of seismic investigations aimed at locating near-surface traces of the Hollywood Fault. The report is added as Appendix O of this EIR. The data indicates more than one near-surface fault trace of the Hollywood Fault. Between North Bronson and North Gower Avenues, evidence exists for a near-surface trace of the Hollywood Fault slightly south of Carlos Avenue.

Section 4.8 Hazards and Hazardous Materials

Page 4.8-42 – Revise the sentence under "Mitigation Measures" as follows:

See Mitigation Measure **HM1** and **HM2**.

Section 4.14 Public Services

Page 4.14-5 – Add a description of the Los Angeles Fire Department (LAFD) Strategic Plan 2018-2020 after the reference to the LAFD Strategic Plan 2015-2017 as follows:

Los Angeles Fire Department (LAFD) Strategic Plan 2018-2020. LAFD's Strategic Plan 2018-2020 states that more than 70% of the goals from the first Strategic Plan were completed through the collaboration of members and stakeholders, and the new 2018-2020 Plan focuses on these five guiding

goals: 1) Provide Exceptional Public Safety and Emergency Service, 2) Embrace a Healthy, Safe and Productive Work Environment, 3) Capitalize on Advanced Technology, 4) Enhance LAFD Sustainability & Community Resiliency, and 5) Increase Opportunities for Personal Growth and Professional Development.

Page 4.14-7 – Update Table 4.14-2 (LAFD Fire Stations Serving the Project Area) as follows:

TABLE 4.14-2: LAFD FIRE STATIONS SERVING THE PROJECT AREA

Fire Station	Address	LAFD Community	Average Response Times (mins) /a/ Non-EMS	Average Response Times (mins) /a/ EMS	Staffing	Service and Equipment
27	1327 N. Cole Ave. Los Angeles, CA 90028	Hollywood	5:41 ~~3:34~~	6:24 ~~4:07~~	15	• Task Force Truck • Ambulance Unit • Urban Search & Rescue
35	1601 N. Hillhurst Ave. Los Angeles, CA 90027	Los Feliz	5:57 ~~3:48~~	6:02 ~~3:52~~	12	• Truck Company • Engine Company • Ambulance Unit
41	1439 N. Gardner St. Los Angeles, CA 90046	Hollywood (North Hills & Northwest)	7:12 ~~5:24~~	6:45 ~~4:39~~	~~8~~6	~~• Truck Company~~ • Engine Company • Ambulance Unit
52	4957 Melrose Ave. Los Angeles, CA 90029	Hollywood (Southeast)	6:05 ~~4:12~~	6:19 ~~4:13~~	7	• Engine Company • Ambulance Unit
56	2759 Rowena Ave. Los Angeles, CA 90039	Silver Lake	7:29 ~~5:30~~	7:30 ~~5:24~~	4	• Engine Company • Ambulance Unit • Heavy Rescue
76	3111 N. Cahuenga Blvd. Los Angeles, CA 90068	Cahuenga Pass	7:39 ~~5:38~~	7:46 ~~5:34~~	4	• Engine Company • Ambulance Unit
82	5769 Hollywood Blvd. Los Angeles, CA 90028 (West Bureau Headquarters)	Hollywood (Hills & Northeast)	6:31 ~~4:25~~	6:12 ~~4:01~~	6	• Engine Company • Ambulance Unit

Note: Non-EMS = fire and other services; EMS = Emergency Medical Services
/a/ Average response metrics for January-December 2016.
SOURCE: LAFD, *FireStatLA*, www.lafd.org, Navigate LA; TAHA, 2017, 2021.

Page 4.14-9 – Add information about the LAFD's Strategic Plan 2018-2020, including relevant footnotes for reference, that is consistent with the fire discussion in the recirculated Section 4.15 - Transportation and Traffic of the RDEIR as follows:

Based on the assessment of these key areas, the study made numerous recommendations, including the development of a strategic plan and Standards of Cover. The LAFD prepared *A Safer City: Strategic Plan 2015-2017*, the LAFD's first strategic plan, as discussed above.[8] In 2018, LAFD released the new Strategic Plan 2018-2020, A Safer City 2.0, which reports that since the previous Strategic Plan was released, LAFD has hired hundreds of new firefighters, implemented the Four Bureau Reorganization, and created innovative resources such as the Advanced Provider Response Unit (APRU) and the Fast Response Vehicle program as well as other pilot programs.[9] The new Strategic Plan has updated goals that are more refined. The five goals are 1) Provide exceptional public safety and emergency service, 2) Embrace a healthy, safe and productive work environment, 3) Capitalize on Advanced Technology, 4)

[8]LAFD, *A Safer City, Strategic Plan 2015-2017*, April 2015.

[9] LAFD, Strategic Plan, 2018-2020, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed September 23, 2019

Enhance LAFD sustainability and community resiliency, and 5) Increase opportunities for personal growth and professional development. Goal 1 includes improving emergency response times, the delivery of EMS, resource deployment and readiness to respond to disasters. Goal 1 includes an objective to complete the Standards of Cover deployment analysis to determine the optimal distribution and concentration of resources and ensure a safe and effective response force for fire suppression, EMS and specialty response situations. The recommendations from the Standards of Cover are expected to be identified based on different geographic areas in the City; the Standards of Cover study was funded in the City's 2019-2020 budget and is expected to be completed within the next few years.[10]

Page 4.14-11 – Update the discussion in the first full paragraph as well as the response times and incident count in Table 4.14-5: LAFD Fire Station Incident EMS Response Data Year 2016 as follows:

~~The Citywide response time goal is five minutes.~~ LAFD publishes average operational response times citywide and by specific fire stations online through FIRESTATLA: http://www.lafd.org/fsla/stations-map, and was the first fire agency in the United States to release response times to the public.[12] The average Citywide LAFD response time for 2016 for non-EMS events is 64 minutes and 16 seconds and 64 minute 3022 seconds for EMS events~~, which is within the citywide response time goal~~.[11] The average response times for non-EMS and EMS events for the fire stations that serve the Project Area are provided in **Table 4.14-5**.

TABLE 4.14-5: LAFD FIRE STATION INCIDENT EMS RESPONSE DATA Year 2016 /a/

Fire Station No.	Average Response Times /b, c/		Incident Count		
	Non-EMS	EMS	Non-EMS	EMS	Total Incidents
Citywide /d/	6:16~~4:16~~	6:30~~4:22~~	65,833	378,954	444,787
27	5:41~~3:34~~	6:24~~4:07~~	1,334 ~~1,359~~	6,590~~6,546~~	7,924~~7,905~~
35	5:57~~3:48~~	6:02~~3:52~~	690 ~~651~~	4,841~~4,872~~	5,531~~5,523~~
41	7:12~~5:24~~	6:45~~4:39~~	1,024 ~~1,003~~	3,986~~3,991~~	5,010~~4,994~~
52	6:05~~4:12~~	6:19~~4:13~~	558 ~~554~~	3,750~~3,747~~	4,308~~4,301~~
56	7:29~~5:30~~	7:30~~5:24~~	427 ~~413~~	1,925~~1,937~~	2,352~~2,350~~
76	7:39~~5:38~~	7:46~~5:34~~	288 ~~261~~	1,158~~1,183~~	1,446~~1,444~~
82	6:31~~4:25~~	6:12~~4:01~~	901 ~~867~~	3,632~~3,659~~	4,533~~4,526~~

/a/ District Response Metrics for January-December 2016.
/b/ Non-EMS = fire and other services; EMS = Emergency Medical Services
/c/ Average Operational Response Time~~Travel Time in District~~, January – December 2016
/d/ The Citywide incident count is the sum of the incident counts is the sum of the LAFD fire station counts, January – December 2016
SOURCE: Los Angeles Fire Department, *FireStatLA*, www.lafd.org, Navigate LA; TAHA, 2017, 2021.

Page 4.14-50 – Revise the first paragraph of the discussion under Impact 4.14-4 as follows:

The Proposed Plan ~~does not contain any specific~~ includes several regulations ~~or~~ and policies related to reducing demands on parks and recreational facilities, including development incentives for non-residential projects to provide on-site publicly accessible open space through the Hollywood CPIO District, as well as several policies that speak to the Plan's support of public parks and more open space under Goals PR2, PR3, and PR4 of the Hollywood Community Plan policy document. As discussed

[10] Meeting between Department of City Planning and LAFD staff on September 3, 2019; City of Los Angeles Budget Summary FY 2019-2020: http://cao.lacity.org/budget19-20/2019-20Budget_Summary.pdf, accessed September 24, 2019.

~~[11]For informational purposes, Citywide LAFD response times and standards are less than the average response times of other large jurisdictions, such as the City of Pasadena Fire Department (between 6 minutes and 10 seconds to 8 minutes and 18 seconds) and San Diego Fire Department (between 6 minutes and 46 seconds to 11 minutes and 36 seconds, depending on the station). (Pasadena Fire Department, *FY2016 Information Sheet*, 2016; City of San Diego Fire Rescue Department, *Standards of Response Cover Review*, February 22, 2017).~~

above, there are no planned new parks in the Plan Area. Under the Proposed Plan, all existing parks and recreational facilities in the Project Area would remain.

Section 4.15 Transportation and Traffic (Recirculated Draft EIR)

Page 4.15-19 – Update Table 4.15-5 as follows:

TABLE 4.15-5: LAFD FIRE STATIONS SERVING THE PROJECT AREA

Fire Station	Address	LAFD Community	Average Response Times (mins) /a/		Staffing	Service and Equipment
			Non-EMS	EMS		
27	1327 N. Cole Ave. Los Angeles, CA 90028	Hollywood	5:41 ~~5:40~~	6:24 ~~6:23~~	15	• Task Force Truck • Ambulance Unit • Urban Search & Rescue
35	1601 N. Hillhurst Ave. Los Angeles, CA 90027	Los Feliz	5:57 ~~5:56~~	6:02	12	• Truck Company • Engine Company • Ambulance Unit
41	1439 N. Gardner St. Los Angeles, CA 90046	Hollywood (North Hills & Northwest)	7:12 ~~7:11~~	6:45	~~8~~6	~~• Truck Company~~ • Engine Company • Ambulance Unit
52	4957 Melrose Ave. Los Angeles, CA 90029	Hollywood (Southeast)	6:05 ~~6:04~~	6:19 ~~5:18~~	7	• Engine Company • Ambulance Unit
56	2759 Rowena Ave. Los Angeles, CA 90039	Silver Lake	7:29 ~~7:28~~	7:30 ~~7:29~~	4	• Engine Company • Ambulance Unit • Heavy Rescue
76	3111 N. Cahuenga Blvd. Los Angeles, CA 90068	Cahuenga Pass	7:39 ~~5:38~~	7:46 ~~5:34~~	4	• Engine Company • Ambulance Unit
82	5769 Hollywood Blvd. Los Angeles, CA 90028 (West Bureau Headquarters)	Hollywood (Hills & Northeast)	6:31	6:12 ~~6:11~~	6	• Engine Company • Ambulance Unit

Note: Non-EMS = fire and other services; EMS = Emergency Medical Services
/a/ Average response metrics for January-December 2016.
SOURCE: LAFD, *FireStatLA*, www.lafd.org, Navigate LA; TAHA, 2017, 2019, 2021.

CHAPTER 6.0 – OTHER CEQA CONSIDERATIONS

Section 6.2 Significant Environmental Effects that Cannot be Avoided if the Proposed Plan is Implemented

Page 6-1 – Revisions to the bullet points as follows:

- **Biological Resources** (Special Status Species Habitat, Riparian Habitat, Wetlands, and Migratory Wildlife~~, Biological Resources Plan~~)

- **Noise** (~~Construction Noise, Operational Stationary Noise, and~~ Groundborne Vibration/Noise – Construction, Permanent Increase – Stationary Noise, Temporary Increase – Construction Noise)

Page 6-1 – Delete the sixth bullet point as follows:

- ~~**Transportation and Traffic** (Operation of Vehicular Circulation System, Neighborhood Traffic Intrusion, Congestion Management Plan [CMP], Construction Traffic Disruption)~~

Page 6-5 – Delete the reference to Transportation and Traffic under Potential Secondary Effects for consistency with the recirculated Transportation and Traffic section of the EIR as follows:

~~**TRANSPORTATION AND TRAFFIC**~~

~~Mitigation Measures **T1**, **T2**, and **T4** involve physical improvements and programs that are designed to reduce traffic impacts. The physical improvements include ITS signal and corridor upgrades, intersection improvements, and congestion monitoring technology upgrades. A Neighborhood Traffic Management Program would be implemented on impacted residential streets; and a Traffic Control Plan would be implemented during construction activities to mitigate the impact of traffic disruption and to ensure the safety of all users of the affected roadway. Mitigation Measure **T3** would require coordination with other agencies to identify transportation improvements and seek opportunities to jointly pursue funding if future development projects could potentially impact vehicular operations on transportation systems managed by other agencies. It is possible that some physical improvements may be implemented through the coordination and funding efforts. Implementation of some of the improvements and program in Mitigation Measures **T1** through **T4** may result in temporary air quality and noise effects, as well as traffic impacts, along the associated roadways during the period construction of the improvement would occur. Such activities would not be of sufficient scale to create new significant impacts or to compound a previously analyzed impact such that a less-than-significant impact would exceed established thresholds of significance. No adverse secondary impacts would result from these measures.~~

Section 6.7 Less Than Significant Impacts

Page 6-6 – Revisions to the list of issues noted as having less than significant impacts for Transportation and Traffic. Revise the 6th bullet as follows:

Transportation and Traffic (Consistency with adopted policies, plans, and programs addressing the Circulation System, Vehicle Miles Traveled, Design Feature Hazards, ~~Conflict with Adopted Policies, Plans, and Programs; Hazards associated with a Design Feature or Incompatible Uses;~~ Emergency Access~~; Transit Facilities)~~

APPENDICES

The following EIR Appendices have been modified and technical refinements have been made (changes are summarized in **Chapter 2.0**) and are replaced in their entirety (and are included in this Final EIR document):

- Appendix C: *Updated* Proposed Change Area Map and Change Matrix (August 2021)
- Appendix D: *Updated* Draft Community Plan (August 2021)
- Appendix E: *Updated* CPIO (August 2021)

The following new appendices are added to the Final EIR and included in this Final EIR document:

- Appendix O: 2018 U.S. Geological Survey–California Geological Survey Fault-Imaging Surveys Across the Hollywood and Santa Monica Faults, Los Angeles County, California
- Appendix P: Modifications to CEQA Guidelines Appendix G

5.0 MITIGATION MONITORING PROGRAM

Public Resources Code (PRC) Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097 require adoption of a Mitigation Monitoring Program (MMP) for all projects for which an Environmental Impact Report (EIR) has been prepared. Specifically, PRC Section 21081.6 states that "…the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment… [and that the program] …shall be designed to ensure compliance during project implementation."

CEQA Guidelines Section 15097 provides guidelines for implementing monitoring and reporting programs. Specific monitoring requirements to be enforced during project implementation must be defined prior to final approval of a project by the decision-maker. Although the Lead Agency (the City of Los Angeles) may delegate monitoring responsibilities to other agencies or entities, the Lead Agency "…remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The MMP describes the procedures for the implementation of the mitigation measures adopted for the Proposed Plan. The MMP for the Proposed Plan will be in place through the planning horizon of the Plan (2040) or until the Plan and EIR are updated again, whichever is later. The City of Los Angeles Department of City Planning (DCP) staff and staff of other City Departments (e.g., Department of Building and Safety) shall be responsible for administering the MMP activities or delegating them to consultants, or contractors. The Monitoring or Enforcing Agencies identified herein, at their discretion, may require a project applicant or operator to pay for one or more independent environmental monitor(s) to be responsible for monitoring implementation of mitigation measures (e.g., City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures) required of project applicants or operators. Monitors would be hired by the City or by the applicant or operator at the City's discretion.

Each mitigation measure is identified in **Table 5-1** and is categorized by environmental topic and corresponding number, with identification of:

- The Implementing Agency – this is in most cases, the applicant for individual projects who will be required to implement most of the measures.
- The Enforcement Agency and Monitoring Agency – this is the agency or agencies that will monitor each measure and ensure that it is implemented in accordance with this MMP.
- Monitoring Phase / Monitoring Actions – this is the timeframe that monitoring would occur and the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

Many of the mitigation measures are implemented through the adoption of environmental standards in the Hollywood Community Plan Implementation Overlay District (CPIO). Others are to be implemented through the City's imposition of conditions of approval on future discretionary projects.

For the mitigation measures implemented through the CPIO, the CPIO shall do all of the following:

(1) Adopt environmental standards to implement, and that are consistent with, the mitigation measures required on projects in the CPIO;

(2) Require projects in the CPIO subareas to substantially conform with all applicable environmental standards, subject to the discretion of the enforcing and monitoring agency; and

(3) Provide for the modification or a deletion of an environmental standard subject to the following:

a. The decision-maker finds in writing, based upon substantial evidence, the environmental standard is not necessary to mitigate the impact identified in the EIR, including on the basis of the existence of a similar or more effective regulation that applies to the project (such as an Air District rule) or a project design feature; or

b. The decision-maker finds in writing, based on substantial evidence, that the environmental standard is infeasible, and the decision-maker has adopted a new equally or more effective measure and the new measure will not result in any new significant impact and the decision-maker finds under CEQA Guidelines Section 15162, the new mitigation measures does not require a subsequent environmental clearance to the EIR; or

c. The City complies with CEQA Guidelines Sections 15162 and/or 15164, including by preparing an addendum or subsequent environmental clearance to the EIR to analyze the impacts from the modifications to the mitigation measure in the EIR; or

d. The City prepares a new CEQA clearance for an individual project that supports the modification or deletion of the mitigation measure in the EIR.

(4) Authorize any City implementing, monitoring, or enforcing agency, to require the applicant to hire an outside consultant, subject to City approval, that will monitor and certify compliance with the environmental standards, or develop any other administrative procedures to ensure compliance with the environmental standards, including but not limited to requiring applicant's to sign acknowledgement of environmental standards and provide affidavit committing to comply with applicable environmental standard, and maintain records for certain period of time and hold records available for City inspection to demonstrate compliance.

Mitigation measures required outside of the CPIO shall be imposed as a condition of approval subject to the City's authority to condition the applicable entitlement for any subsequent approval and environmental review associated with the Hollywood Community Plan Update EIR pursuant to CEQA Guidelines Sections 15162, 15163, 15164, or 15168, or tiered clearance to the Hollywood Community Plan Update EIR, pursuant to the procedures in CEQA Guidelines Section 15152, or streamlining CEQA Clearance permitted in PRC Sections 21083, 21094.5, 21155-21155.2, 21155.4 or CEQA Guidelines Sections 15183 or 15183.3. Mitigation measures imposed as a condition of approval shall be imposed with a MMP that includes all of the following provisions:

(1) This MMP shall be enforced throughout all phases of development projects subject to the mitigation measures. The Applicant shall be responsible for implementing each project design feature and mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each project design feature and mitigation measures has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure. Such records shall be made available to the City upon request. Further, specifically during the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Annual Compliance Report. The Construction Monitor shall be obligated to immediately report to the

Enforcement Agency any non-compliance with the mitigation measures and project design features within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

(2) Modifications. The project shall be in substantial conformance with the mitigation measures contained in this MMP. The enforcing departments or agencies may determine substantial conformance with mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines Sections 15162 and 15164, including by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a mitigation measure shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or the non-environmental conditions of approval.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** /a/ /b/
AESTHETICS				
AE1	For any new construction on a building requiring site plan review, prior to the issuance of any building permits, the applicant shall submit plans and specifications for all exterior building materials to the Department of City Planning (DCP) and the Department of Building and Safety (DBS) for review and approval. Glass as part of the external façade of buildings shall be no more reflective than necessary to comply with Green Building Code or other state or local UV requirements.	Applicant for individual project	DCP, DBS	Prior to the issuance of building permits requiring site plan review: review and approval of building and construction plans by DBS.
AIR QUALITY				
AQ1	The City shall require all projects that are in a CPIO District subarea or are discretionary to include in the agreements with contractors and subcontractors the following, or equivalent, best management practices in contract specifications: • All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the USEPA Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of NOX and DPM to no more than Tier 3 levels unless certified by engine manufacturers or the on-site air quality construction mitigation manager that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" for the following, as well as other, reasons: o There is no available retrofit control device that has been verified by either the CARB or USEPA to control the engine in question to Tier 3; o The construction equipment is intended to be on site for five days or less; or o Relief may otherwise be granted from this requirement if a good faith effort has been made to comply with this requirement and that compliance is not practical for technical, legal, economic, or other reasons. • All construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.	Applicant for individual project **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Prior to construction: submission to DBS contract specifications required of each project. **Adoption of CPIO which includes environmental standard.**

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** [a] [b]
	• Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible, or solar where available. • Construction contractors shall use prepainted construction materials, as feasible. • Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow. • Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible. • Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. • Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.			
BIOLOGICAL RESOURCES				
BR-1	For discretionary projects that are in or within 200 feet of Griffith Park, dedicated open space or are required to comply with the City's Baseline Hillside Ordinance, project applicants shall be required to conduct a biological resources assessment report to characterize the biological resources on-site and to determine the presence or absence of sensitive species. The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats (such as wetlands or riparian areas), and 3) any potential impacts of proposed project on wildlife corridors and wildlife movement across the property or within the property vicinity. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. Survey times should correspond with the most likely time the potential species would be observed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur onsite). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate. The biological resources assessment report will document the potential for the sensitive species to occur on the site.	Applicant for individual project	DCP, CDFW	Prior to the issuance of grading permits: submit completed biological resources assessment report to DCP and CDFW. On completion of ground disturbing activities: submit a follow-up report documenting construction monitoring, relocation methods, and results of monitoring.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
	If sensitive species and/or habitat are absent from or there is no suitable habitat to support the sensitive species on the individual project site and adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to DCP prior to issuance of a grading permit. If sensitive species and/or habitat are identified, the biological resources assessment report shall require pre-construction surveys for sensitive species and/or construction monitoring to ensure avoidance, relocation, or safe escape of the sensitive species from the construction activities, as appropriate. If sensitive species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or during construction monitoring, construction activities shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate off-site habitat areas. A qualified biologist shall be on-site to conduct surveys, for construction monitoring, to perform or oversee implementation of protective measures, and to determine when construction activity may resume. Additionally, the biological resources assessment report shall be submitted to DCP and CDFW prior to any ground-disturbing activities. A follow-up report documenting construction monitoring, relocation methods, and the results of the monitoring and species relocation shall also be submitted to DCP and CDFW following construction.			
BR-2	If indicated as appropriate by the biological resources assessment report required in BR1, focused surveys for special status plants shall be conducted. Prior to vegetation clearing for construction in open space areas, special status plants identified in the focused surveys shall be counted and mapped and a special-status plant relocation plan shall be developed and implemented to provide for translocation of the plants. The plan shall be prepared by a qualified biologist and shall include the following components: (1) identify an area of appropriate habitat, on-site preferred; (2) depending on the species detected, determine if translocation will take the form of seed collection and deposition, or transplanting the plants and surrounding soil as appropriate; (3) develop protocols for irrigation and maintenance of the translocated plants where appropriate; (4) set forth performance criteria (e.g., establishment of quantitative goals, expressed in percent cover or number of individuals, comparing the restored and impacted population) and remedial measures for the translocation effort; and (5) establish a five-year monitoring procedures/protocols for the translocated plants. Five years after initiation of the restoration activities, a report shall be submitted to DCP and CDFW, which shall at a minimum discuss the implementation, monitoring, and	Applicant for individual project	DCP, CDFW, USFWS	Prior to the issuance of grading permits: submission of Plant Relocation Plan to DCP and CDFW. Five years after initiation of restoration activities: submit report discussing implementation, monitoring, and management of restoration activities to DCP, CDFW and USFWS as applicable. Receipt of sign-off from agencies that performance criteria have been met. If no ongoing restoration to be undertaken until performance criteria accepted as met by applicable agencies.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** [a] [b]
	management of the restoration activities over the five-year period and indicate whether the restoration activities have, in part or in whole, been successful based on the established performance criteria. The restoration activities shall be extended if the performance criteria have not been met at the end of the five-year period to the satisfaction of DCP, CDFW, and USFWS, when applicable.			**Adoption of CPIO which includes environmental standard.**
BR-3	During environmental review for projects that are discretionary or in a CPIO District subarea, in areas potentially containing jurisdictional waters or riparian habitat, including streams, wetlands, riparian habitat, and other water bodies, affected sites as well as off-site areas that may be directly or indirectly affected by the individual development project shall be surveyed by a qualified biologist for Waters of the U.S. and Waters of the State (e.g., streams, wetlands, or riparian habitat). Whenever possible, individual projects shall be designed and/or sited to avoid disturbance to or loss of jurisdictional resources. If Waters of the U.S. or Waters of the State cannot be avoided and would be affected by the individual project, the regulatory agencies shall be consulted regarding the required permits. Individual project applicants shall demonstrate to DCP, if the lead agency, the regulating agency that the requirements of agencies with jurisdiction over the subject resource can be met prior to obtaining grading permits. This will include, but not be limited to, consultation with those agencies, securing the appropriate permits, waivers, or agreements, and arrangements with a local or regional mitigation bank including in lieu fees, as needed.	Applicant for individual project **Council for adoption of CPIO**	DCP **Council for adoption of environmental standards in CPIO**	Prior to project approval: submit report to regulating agencies demonstrating compliance with requirements. **Adoption of CPIO which includes environmental standard.**
BR-4	At the discretion of the regulatory agencies, including DCP, if applicable, discretionary development projects resulting in the modification, change, and/or loss of Waters of the U.S. and Waters of the State (e.g., streams, wetland, or riparian habitat) under jurisdiction of the regulatory agencies shall be required to contribute to a mitigation bank, contribute to an in-lieu fee program, establish on-site or off-site restoration of in-kind habitat, or establish on-site or off-site restoration of out-of-kind habitat that is of high value to the watershed and provides important watershed functions. Individual project applicants shall submit a compensatory plan for review and approval by relevant regulatory agencies, including DCP, if applicable. The compensatory plan shall be developed by a qualified biologist or restoration ecologist and approved by the relevant regulatory agencies prior to issuance of a grading permit. The plan shall be based on the ACOE Final Mitigation Guidelines and Monitoring Requirements (April 19, 2004) and the Los Angeles District's	Applicant for individual project	DCP	Prior to the issuance of all building permits; submit compensatory plan for review and approval of regulatory agencies. Prior to Certificate of Occupancy: document compliance with compensatory plan and submit to DCP.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
	Recommended Outline for Draft and Final Compensatory Mitigation and Monitoring Plans.[1] In broad terms, this plan shall at a minimum include: • Description of the project/impact and mitigation sites • Specific objectives • Implementation plan • Success criteria • Required maintenance activities • Monitoring plan • Contingency measures At the discretion of DCP and relevant regulatory agencies, Waters of the U.S. and Waters of the State shall be replaced at a minimum 3:1 ratio. The specific success criteria and methods for evaluating whether an individual development project has been successful at meeting those criteria shall be determined by the qualified biologist or restoration ecologist and included in the compensatory plan. Implementation of the compensatory plan shall commence prior to issuance of a grading permit for individual projects. If the compensatory plan involves establishment or restoration activities, these activities shall be implemented over a five-year period. The establishment or restoration activities shall incorporate an iterative process of annual monitoring and evaluation of progress, and allow for adjustments to the activities, as necessary, to achieve desired outcomes and meet the success criteria. Five years after initiation of establishment or restoration activities, a final report shall be submitted to the relevant regulatory agencies and DCP, which shall at a minimum discuss the implementation, monitoring, and management of the activities over the five-year period, and indicate whether the activities have, in part, or in whole, been successful based on established success criteria. The establishment or restoration activities shall be extended if the success criteria have not been met to the satisfaction of DCP and relevant regulatory agencies.			

[1] The USACE's Final Mitigation Guidelines and Monitoring Requirements (April 19, 2004) is available at the Army Corps of Engineers Los Angeles District Regulatory Division webpage at www.spl.usace.army.mil/regulatory/. This document contains the Los Angeles District's Recommended Outline for Draft and Final Compensatory Mitigation and Monitoring Plans. This publication is intended to serve as a technical guide for permit applicants preparing compensatory mitigation plans and identifies the types and extent of information that agency personnel need to assess the likelihood of the success of mitigation proposals. The Los Angeles District's outline is adapted to specific issues encountered in the region.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.

/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** [a] [b]
BR-5	For projects that are discretionary or in a CPIO District subarea, prior to construction activities on properties that contain seasonal or perennial streams, year-round or intermittent wetlands, riparian habitat, or the Los Angeles River, project applicants shall be required to prepare and submit to the U.S. Army Corps of Engineers a "Preliminary Delineation Report for Waters of the U.S." (which shall delineate any on-site wetlands) and, as appropriate, a Streambed Alteration Notification package to CDFW. If these agencies determine that project features are not regulated under their jurisdiction, then no further protection measure is necessary. However, if the U.S. Army Corps of Engineers determines that a federally-protected wetland is located on-site or considers the feature to be jurisdictional through a "significant nexus" test per recent U.S. Army Corps of Engineers and USEPA guidance,[2] then a Clean Water Act Section 404 permit shall be obtained from the U.S. Army Corps of Engineers, and any permit conditions shall be agreed to, prior to the start of construction activities in the affected area. If CDFW determines that the drainage is a regulated "streambed", then a Streambed Alteration Agreement shall be entered into with CDFW and any associated conditions shall be agreed to prior to the start of construction in the affected area.	Applicant for individual project **Council for adoption of CPIO**	U.S. Army Corps of Engineers, CDFW **Council for adoption of environmental standards in CPIO**	Prior to construction: prepare and submit a Preliminary Delineation Report for Waters of the U.S. to the U.S. Army Corp of Engineers and Streambed Alteration Notification package to CDFW. Obtain 404 permit and Streambed Alteration Agreement as needed. **Adoption of CPIO which includes environmental standard.**
BR-6	For discretionary projects that are in or within 200 feet of Griffith Park, dedicated open space, or are required to comply with the City's Baseline Hillside Ordinance, the biological resources assessment report, as mentioned in **Mitigation Measure BR-1**, shall analyze how the individual development project could affect wildlife corridors and wildlife movement. The biological resources assessment report shall include a biological constraints analysis that shall identify measures (such as providing native landscaping to provide cover on the wildlife corridor) that the individual project would be required to implement such that the existing wildlife corridor would remain. Wildlife corridors identified in the biological resources assessment report shall not be entirely obstructed from wildlife passage by the discretionary project. Measures to support wildlife movement include but are not limited to: retention of onsite native trees and vegetation, or unobstructed setbacks or wildlife friendly fencing on at least two edges of the property, or minimum 25-foot buffers from the edge of stream, reservoir, riparian or wetland habitat.	Applicant for individual project	DCP	Prior to construction: submit biological resources assessment report to DCP. Address recommendations to protect wildlife corridors if any and document in report to DCP document.

[2] U.S. Environmental Protection Agency and U.S. Department of the Army, Clean Water Act Jurisdiction Following the US. Supreme Court's Decision in *Rapanos v United States & Carabell v. United States.* June 5, 2007.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.

/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** /a/ /b/
CULTURAL RESOURCES				
CR1	For all discretionary projects or projects in a CPIO District Subarea, that involve disturbance of previously undisturbed soils, a qualified archaeologist shall be required to monitor excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), the City Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological materials or associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist.	Applicant for individual projects **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Construction: if resources are found memorandum from archaeologist recommending actions and final report documenting assessment and processing of resources to be submitted to DBS. **Adoption of CPIO which includes environmental standard.**
CR2	For all discretionary projects or projects in a CPIO District Subarea, the City shall require that all cultural resources identified on a site be assessed and treated in a manner consistent with PRC Section 21083.2, as determined appropriate by a qualified archaeologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition.	Applicant for individual project **Council for adoption of CPIO**	DCP - Office of Historic Resources **Council for adoption of environmental standards in CPIO**	Construction: completion of report documenting finds and disposition and submission to DCP - Office of Historic Resources. **Adoption of CPIO which includes environmental standard.**
CR3	For all projects that are not subject to **Mitigation Measures CR1** and **CR2** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants: • California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." • Best practices to ensure archaeological resources are not damaged	Applicant for individual project	DBS	Pre-construction: DBS receipt of acknowledgement.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** /a/ /b/
	include but are not limited to the following steps: o A qualified archaeologist monitors excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. o If archaeological resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines. o Personnel of the project shall not collect or move any archaeological materials or associated materials. o If cleared by a qualified archaeologist, construction activity may continue unimpeded on other portions of the project site. o The found deposits shall be treated in accordance with federal, state, and local guidelines and regulations. o As provided in Public Resources Code Section 21083.2, archaeological resources should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by an archaeologist. o Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a qualified archeologist and the archaeologist clears the site for construction activity.			
CR4	At the time of application for discretionary projects or project in a CPIO District Subarea that involve grading, trenching, or other new ground disturbance in areas with high paleontological resource sensitivity, the project applicant shall conduct a paleontological assessment to further evaluate the potential impacts to paleontological resources and, as necessary, take actions to preserve significant paleontological resources. Specific requirements include: a) **Retain a Qualified Paleontologist**. Prior to initial ground disturbance, the applicant shall retain a project paleontologist, defined as a paleontologist who meets the SVP standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources. A qualified paleontologist (Principal Paleontologist) is defined	Applicant for individual project **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Prior to construction: completion of report as required in measure and submission to DBS. Construction: monitoring of excavation as needed and completion of report as appropriate documenting findings to be submitted to DBS. **Adoption of CPIO which includes environmental standard.**

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
	by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, preferably southern California, and who has worked as a paleontological mitigation project supervisor for a least one year. b) **Paleontological Resources Assessment**. Prior to any construction activity in areas determined to have a low to high paleontological sensitivity that increases with depth, a Qualified Professional Paleontologist shall prepare a Paleontological Resources Assessment to the satisfaction of the City to evaluate potential for impacts to paleontological resources from development of the proposed project. The Paleontological Resources Assessment may require a museum records search from the Natural History Museum of Los Angeles County to identify whether previous paleontological localities exist within the development area and if so, at what depth(s). If the project paleontologist determines that sediments on a development site are sensitive for scientifically important paleontological resources, steps **Mitigation Measure CR4c to g** shall be taken prior to, during, and after construction activities. A Paleontological Resources Assessment shall not be required for development areas already identified as having a high paleontological sensitivity at the surface. c) **Paleontological Mitigation and Monitoring Program.** Prior to construction activity a qualified paleontologist shall prepare a Paleontological Mitigation and Monitoring Program, subject to City approval, to be implemented during ground disturbance activity for the proposed project. This program should outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications. d) **Paleontological Worker Environmental Awareness Program (WEAP).** Prior to the start of construction, the project paleontologist or his or her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting at which a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to			

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions [a] [b]
	evaluate the find before restarting work in the area. If it is determined that the fossil(s) is(are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources. e) **Paleontological Resource Construction Monitoring.** Ground disturbing construction activities (including grading, trenching, foundation work and other excavations) in undisturbed sediments, below five feet, with high paleontological sensitivity should be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring should be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. The duration and timing of the monitoring will be determined by the project paleontologist. If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension would need to be reconsidered by the Supervising Paleontologist. Ground disturbing activity that does not occur in undisturbed sediments with high paleontological sensitivity would not require paleontological monitoring. f) **Fossil Salvage.** If fossils are discovered, the project paleontologist or paleontological monitor shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. g) **Final Paleontological Mitigation Report.** Upon completion of ground			

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
	disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. h) For any discoveries of paleontological resources not covered by the above process, the applicant shall comply with **Mitigation Measure CR4f.**			
CR5	For all discretionary projects or projects in a CPIO District Subarea, the City shall require that all paleontological resources identified on a project site be assessed and treated in a manner determined by a qualified paleontologist in consultation with the City's Office of Historic Resources. A report shall be prepared according to current professional standards that describes the resource, how it was assessed, and disposition. Any reports and surveys shall be submitted to the City's Office of Historic Resources and the Natural History Museum of Los Angeles County.	Applicant for individual project **Council for adoption of CPIO**	DCP - Office of Historic Resources **Council for adoption of environmental standards in CPIO**	Prior to Certificate of Occupancy: submit report of paleontological resources to the City's Office of Historic Resources and the Natural History Museum of Los Angeles County. **Adoption of CPIO which includes environmental standard.**
CR6	For all projects that are not subject to **Mitigation Measure CR4** and **CR5** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants: • California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." • Public Resources Code Section 5097.5 (a) states, in part, that: No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, on public lands, except with the express permission of the public agency having jurisdiction over the lands. • Best management practices to ensure unique geological and paleontological resources are not damaged include but are not limited to the following steps: o Prior to excavation and grading activities a qualified paleontologist	Applicant for individual project and DBS	DBS	Prior to the issuance of excavation or grading permits; receipt of acknowledgement by DBS.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** [a] [b]
	prepares a resource assessment using records from the Natural History Museum of Los Angeles County. o If in the assessment, the soil is identified as potentially containing paleontological resources, a qualified paleontologist monitors excavation and grading activities in soils that have not been previously disturbed, to identify, record, and evaluate the significance of any paleontological finds during construction. o If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until a qualified paleontological has evaluated the find in accordance with federal, state, and local guidelines. o If fossils are discovered, a qualified paleontologist shall recover them. Typically fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist would have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils should be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. All other federal, state and local laws related to such resources would be complied with. o Personnel of the project would not collect or move any paleontological materials or associated materials. o If cleared by the qualified paleontologist, construction activity would continue unimpeded on other portions of the project site. o Construction activities in the area where resources were found would commence once the identified resources are properly assessed and processed by a qualified paleontologist and if construction activities were cleared by the qualified paleontologist.			

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
CR7	For all discretionary projects or projects in a CPIO District Subarea where excavation could extend below previously disturbed levels, notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of proposed projects in that area. If the potential for tribal resources exists, excavation in previously undisturbed soils shall be monitored by a qualified Tribal Monitor. If tribal resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until an appropriate Tribal Representative has evaluated the find. Construction personnel shall not collect or move any tribal resources. Construction activity may continue unimpeded on other portions of the project site. Any tribal resources shall be treated with appropriate dignity and protected and preserved as appropriate.	Applicant for individual project **Council for adoption of CPIO**	California Native American tribes, DCP **Council for adoption of environmental standards in CPIO**	Pre-construction: notification to applicable tribes that have submitted request. Construction: documentation of Tribal Representative evaluation of any finds and disposition submitted to DBS. **Adoption of CPIO which includes environmental standard.**
CR8	For all projects that are not subject to **Mitigation Measure CR7** that are seeking excavation or grading permits, the Department of Building and Safety shall issue the following notice and obtain an acknowledgement of receipt of the notice from applicants: • Several federal and state laws regulate the treatment of tribal resources, as well as make it a criminal violation to destroy those resources. These include but are not limited to: o California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." o Public Resources Code Section 5097.5 (a) states, in part, that: No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands. • Best practices to ensure tribal resources are not damaged include but are not limited to the following steps: o A qualified tribal monitor or archaeologist qualified to identify tribal resources would monitor excavation and grading activities in soils	Applicant for individual project and DBS	DBS	Prior to the issuance of excavation or grading permits: receipt of acknowledgement by DBS.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions [a] [b]
	that have not been previously disturbed, to identify, record, and evaluate the significance of any archaeological finds during construction. o If tribal resources are uncovered (in either a previously disturbed or undisturbed area), all work ceases in the area of the find until an appropriate tribal representative has evaluated the find or, if no tribal representative is identified, the qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines. o The found deposits shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribal Representative, as well as in accordance of federal, state, and local guidelines. o An agreement would be reached with the Tribe to mitigate or avoid any significant impacts to the Tribal Resources. o The location of the find of Tribal Resources and the type and nature of the find would not be published beyond providing it to public agencies with jurisdiction or responsibilities related to the resources, the qualified archaeologist, and tribal representatives. o Absent an agreement with the Tribe, as provided in Public Resources Code Section 21083.2, archaeological resources should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a qualified archaeologist. o Personnel of the project shall not collect or move any archaeological or tribal resources or associated materials, or publish the location of the tribal resources. o Construction activity may continue unimpeded on other portions of the project site if cleared by the tribal representative or the qualified archaeologist. o Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a tribal representative, or if no tribal representative is identified, a qualified archeologist.			

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** /a/ /b/
HAZARDS AND HAZARDOUS MATERIALS				
HM1	Discretionary projects or projects in a CPIO Subarea District that involve construction related soil disturbance located on land that is currently or was historically zoned as industrial or, previously had a gas station or dry-cleaning facility on-site, shall conduct a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.2. A report setting forth the results of this database search shall be provided to the City and shall be made publicly available (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations §312.10 Definitions). Applicants of the development project shall implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. All remediation shall be subject to City review and approval. Applicants shall consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. No development shall occur until a letter of No Further Action is obtained, if required, by an appropriate agency.	Applicant for individual project **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Pre-construction: Submission of Phase I Environmental Site Assessment to DBS, if no recognized environmental conditions (REC) no further documentation required. If REC are identified preparation of Phase II ESA, If report indicates minor issues that can be addressed through design and/or regulatory compliance without agency involvement submission of Phase II to DBS is sufficient. If Phase II indicates the need for remediation submit remediation plan to DBS and regulatory agency/agencies as appropriate. Submit agency sign off on remediation plan to DBS. Documentation of completion of remediation shall be submitted to the DBS. Submission of No Further Action letter to DBS as may be needed. **Adoption of CPIO which includes environmental standard.**
HM2	For any project not subject to **Mitigation Measure HM1** that seek to excavate below previously disturbed soils, DBS should issue the following notice and obtain an acknowledgement of the receipt of the following notice to all applicants: Hazardous Materials are regulated at the federal, state and local level through numerous regulatory schemes. Applicants are legally required to comply with these laws when development activities involve soils contaminated with hazardous materials. Best management practices to ensure compliance with these federal, state and local laws may include the following: • Prior to doing any soil disturbing activities, a comprehensive search of	Applicant for individual projects and DBS	DBS	Prior to soil disturbing activities: submission of signed acknowledgement to DBS.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM				
No.	**Mitigation Measure**	**Implementing Agency**	**Enforcement and Monitoring Agency**	**Monitoring Phase and Monitoring Actions** /a/ /b/
	databases of sites containing hazardous waste or hazardous materials (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms) is conducted, including on lists prepared pursuant to Government Code, section 65962.2. • If the database search indicates the project site, or property is within one-quarter mile of the project site, has the potential to be contaminated with hazardous waste or hazardous materials for any reason, Phase I and, as needed, Phase II Environmental Site Assessments shall be prepared by a qualified Environmental Professional (as defined in Title 40 Code of Federal Regulations §312.10 Definitions). • Recommendations provided in any Phase II Environmental Site Assessment report for the project site shall be implemented for remedial action. • Property owners and/or applicants consult with appropriate oversight agencies, including the Department of Toxic Substances Control and the Los Angeles Regional Water Quality Control Board, and implement remediation measures to minimize human exposure and prevent further environmental contamination. • No development occurs until a letter of No Further Action is obtained, if required, by an appropriate agency.			
NOISE AND VIBRATION				
N1	The following Vibration Control Plan shall apply to all projects within the Community Plan Implementation Overlay (CPIO) District Subarea, and discretionary projects outside the CPIO subarea, that would include operational heavy-duty construction (e.g., large bulldozer or excavator) equipment within 25 feet of a historical resource, including those in a survey that meets the requirements of Public Resources Code 5024.1, unless determined not to be a historical resource by the Director of Planning, in consultation with the Office of Historical Resource. The Vibration Control Plan shall also apply to all projects that would utilize pile drivers within 135 feet of historic structures. • Prepare a Vibration Control Plan. The Vibration Control Plan shall be approved by the City prior to issuance of a building permit. o The Vibration Control Plan shall be completed by a qualified structural engineer. o The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected	Applicant for individual projects **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Prior to construction: submission of Vibration Control Plan to DBS. **Adoption of CPIO which includes environmental standard.**

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
	historical resource structure. The survey letter shall provide a shoring design to protect the historical resource structure from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels, such as sonic pile driving or caisson drilling instead of impact pile driving. Development projects shall implement the structural engineer's recommendations. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to any impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior's Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).			
N2	Projects within the CPIO subarea and discretionary projects outside the CPIO subarea shall be required to ensure that contractors include best management practices in the contract specifications to reduce damage to vibration-sensitive uses, where appropriate, such as the following: • Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or the use of a sonic vibratory pile driver are alternatives that shall be utilized where geological conditions permit their use. • Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. • The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices.	Applicant for individual project **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Prior to construction: prepare and submit to DBS contract specifications identifying required measures. **Adoption of CPIO which includes environmental standard.**
N3	The following conditions shall apply to all projects within the CPIO subarea and discretionary projects outside the CPIO subarea: • A Noise Study shall be required for Conditional Use Permits for projects that include sources of exterior noise and are located within 500 feet of noise-sensitive uses. Noise-sensitive uses are residences, transient lodgings, schools, libraries, churches (or other places of assembly), hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Noise Study shall characterize the proposed noise sources, quantify noise levels at sensitive uses, and	Applicants for individual projects **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Pre-construction: preparation of a noise study identifying required mitigation and submission to DBS. **Adoption of CPIO which includes environmental standard.**

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
	require feasible mitigation measures to reduce noise levels to less than 5 dBA CNEL above the existing noise levels. Feasible mitigation measures include: o Installation of sound barriers between noise source and receptor; o Use of building design to block line-of-sight between noise source and receptor; and o Decibel and time limitations for stationary sources. • A Noise Study shall be required for projects that include loud source of impulsive sound. The Los Angeles Municipal Code (LAMC) defines impulsive sound as sound of short duration, usually less than one second, with an abrupt onset and rapid decay. By way of example in the LAMC, impulsive sound includes explosions, musical base drum beats, or the discharge of firearms. The Noise Study shall characterize the proposed noise sources, quantify noise levels at sensitive uses, and require feasible mitigation measures to reduce noise levels to less than 20 dBA above the existing noise levels. • Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block the line-of-sight to sensitive receptors. • Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal.			
N4	A Noise Study, prepared by a qualified noise expert and reviewed and approved by DCP to meet the requirements herein, shall be required for all projects within the CPIO subarea and discretionary projects outside the CPIO subarea located within 500 feet of noise-sensitive land uses (e.g., residences, schools, hospitals, and recording studios) and have one or more of the following characteristics: • Two or more subterranean levels or more or 20,000 cubic yards or more of excavated material; • Construction duration (excluding architectural coatings) of 18 months or more; • Use of large, heavy-duty equipment rated 300 horsepower or greater; or • The potential for impact pile driving. Noise-sensitive land uses are residences, transient lodgings, schools, libraries, churches (or other places of assembly), hospitals, nursing homes,	Applicant of individual project **Council for adoption of CPIO**	DBS **Council for adoption of environmental standards in CPIO**	Pre-construction: preparation of a noise study identifying required mitigation and submission to DBS. **Adoption of CPIO which includes environmental standard.**

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.

TABLE 5-1: MITIGATION MONITORING PROGRAM

No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Monitoring Actions /a/ /b/
	auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses, and identify measures to reduce noise exposure. The Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses, and identify measures to reduce noise exposure. Specifically, the Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations including through reliance on any relevant federal, state or local standards or guidelines or accepted industry practices, and in compliance with LAMC standards. Noise reduction devices or techniques, shall include but not be limited to: mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. Each measure in the Noise Study shall identify anticipated noise reductions at noise sensitive land uses. Project applicants shall be required to comply with all measures identified and recommended by the Noise Study and shall provide proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.			

Note: DCP = City of Los Angeles, Department of City Planning; DBS = City of Los Angeles, Department of Building and Safety; CDFW = California Department of Fish and Wildlife; and USFWS = United States Fish and Wildlife Services
SOURCE: TAHA, 2021.

/a/ The Monitoring Phase/Monitoring Actions are applicable to projects that are subject to the measures as described within each measure.
/b/ As a substitute for receiving any reports, studies, documents, any City department can require the applicant to hire an outside consultant to monitor compliance with mitigation measures and certify compliance to the applicable City Department.