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- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
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If you have any questions, please contact the Commission Office at (213) 978-1300.



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

February 11, 2021

TO: Members of the Public

FROM: City Planning Staff

ADDITIONAL INFORMATION FOR THE HOLLYWOOD COMMUNITY PLAN UPDATE

To assist in your review of the Hollywood Community Plan and staff report we would like to refer you to a few other helpful resources:

Community Plan Story Map:

This interactive map shows all proposed zoning changes within Hollywood. Users can zoom in and out, select parcels to see before/after land use and zoning, as well as plan boundaries, street names, neighborhood council areas, and council districts.

<https://ladcp.maps.arcgis.com/apps/MapSeries/index.html?appid=f9d1d0ccda5f40d09b93e213cf1bccf1>

CPIO Story Map:

This is similar to the above story map, but focuses on the CPIO subareas

<https://ladcp.maps.arcgis.com/apps/MapSeries/index.html?appid=c7784b219ef845269c15b0cb4f048ef2>

Reference Materials:

Here we have a collection of topical summary documents highlighting how the plan addresses issues such as climate change, housing, protecting renters, hillsides, historic preservation, video recordings of past webinars etc. Follow the link, and then click the yellow "Hollywood Documents" bar.

<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#resources>

Staff Report & Exhibits:

For your easy reference, the staff report and exhibits are all linked here:

<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>

SECONDARY SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

February 17, 2021

TO: City Planning Commission

FROM: Priya Mehendale, Senior City Planner

CLARIFICATIONS AND CORRECTIONS TO EXHIBIT D FOR CASE NO. CPC-2016-1450-CPU; Hollywood Community Plan Update

The following clarifications and corrections are to be incorporated into Exhibit D (Proposed Hollywood CPIO District Map and Ordinance) attached to the staff recommendation report to be considered at the City Planning Commission meeting on February 18, 2021, related to Item No. 6 on the meeting agenda.

Add the following text to Figures II-2, II-3, II-4, and II-5:

Parcels labeled as ARR (Additional Research Required) have entitlements resulting in changes to the underlying zone of the parcel. Wherever relevant entitlements have expired, properties shall revert to the provisions of the least restrictive adjacent Subarea.

page 20

(f) 100% Affordable Housing/~~Permanent Supportive Housing~~. Projects that provide 100% On-Site Affordable Housing ~~or Permanent Supportive Housing~~ may be granted Additional Incentives from the menu described in the respective Subarea Chapter below.

page 50

Section III-2

~~Site Plan Review Threshold. For a Project in this Subarea, participating in the Hollywood CPIO Community Benefits Program that meets the minimum requirement to be eligible for a benefit under this Subarea, the threshold for site plan review for a development project under LAMC Section 16.05 C.1 (b) will be increased from 50 dwelling units to 100 dwelling units.~~

page 53

Section III-2 A.3 (c)

viii. **Ground Floor height.** Exemption from the Ground Floor Height requirement outlined in Section III-3.

The clarification is to add a sentence to the footnote in four figures to clarify the applicable base floor area ratio for parcels that currently have approved project entitlements. The first correction is to delete the reference to Permanent Supportive Housing as this is governed by

a separate process per section 14.00 of the Los Angeles Municipal Code. The second correction is to remove the reference to the site plan review threshold in Chapter III. The proposed site plan review thresholds are intended to only apply to the Regional Center Subareas and Multi-Family Residential Subareas, and the draft CPIO District incorrectly added this provision to Chapter III (Corridors Subarea). The final correction is to add the exemption from the Ground Floor Height requirement as an incentive in the Corridors Subareas. It was intended to be an incentive in the Regional Center Subareas and Corridors Subareas, however the draft CPIO District omitted this provision in Chapter III (Corridors Subarea).



Planning CPC <cpc@lacity.org>

Abundant Housing LA - comment letter on Hollywood CP update

Anthony Dedousis <anthony@abundanthousingla.org>

Tue, Feb 16, 2021 at 8:00 AM

To: Planning CPC <cpc@lacity.org>

Cc: smillman@millcoinv.com, linda.lou@lacity.org, hollywoodplan@lacity.org, Leonora Camner <leonora@abundanthousingla.org>

Dear Commissioners,

My name is Anthony Dedousis, and I'm director of policy and research at Abundant Housing LA. Ahead of Thursday morning's City Planning Commission hearing, I'm reaching out to [share a comment letter](#) on the proposed Hollywood Community Plan update.

We find that while the proposed Hollywood Community Plan update offers a modest step in the right direction, it does not come close to accommodating the Hollywood area's massive need for housing. We urge you and your colleagues to implement our letter's recommended incremental improvements to the currently proposed Plan, and to consider major revisions to the Plan through the housing element update process.

I'd be happy to discuss AHLA's comments anytime ahead of Thursday morning's hearing. Thank you for your consideration.

Regards,

Anthony

--

Anthony Dedousis

Director, Policy and Research
Abundant Housing LA
[515 S Flower Street, 18th Floor](#)
[Los Angeles, CA 90071](#)
516-660-7402



February 16, 2021

Ms. Samantha Millman
President, City Planning Commission
201 N. Figueroa Street
Los Angeles, CA 90012

Dear Ms. Millman,

Thank you for the opportunity to comment on the forthcoming update to the Hollywood Community Plan. We are writing on behalf of **Abundant Housing LA**, a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis. Our organization supports more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

As you know, the City of Los Angeles is suffering from a severe housing crisis. Exclusionary zoning and longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive shortage of medium and high density housing, especially near jobs and transit. Since 2013, Los Angeles' housing supply has [grown by just 4%](#).

This has made Los Angeles one of the nation's most unaffordable housing markets; [according to the Los Angeles Times](#), the average rent rose 65% since 2010, to over \$2,500. High rents and a lack of new housing opportunities have caused greater financial pressure on families, longer commutes, increasing carbon emissions, more displacement of historically disadvantaged communities, high homelessness, and reduced access to economic and educational opportunity. This has also reinforced longstanding patterns of income and racial segregation in our city's neighborhoods.

Fixing these problems requires us to encourage the construction of hundreds of thousands of new homes, both market-rate and deed-restricted affordable, throughout our city. Fortunately, the Regional Housing Needs Assessment (RHNA) affords Los Angeles the opportunity to finally address its housing crisis in a transformational way. In the upcoming Housing Element Planning Cycle, Los Angeles must accommodate **456,000 new homes** by the end of the decade, **40%** of which must be affordable to households with low or very low incomes.

To achieve this goal, the City will need to update its housing element and community plans in order to accommodate this historic amount of housing production. In particular, denser housing production is needed in neighborhoods with excellent access to transit and jobs, like Hollywood. This will reduce rents, improve access to jobs and transit, strengthen the local economy, protect

the environment and reduce car dependency, reduce displacement, and promote racial and socioeconomic equity.

Additionally, it is imperative that City policy promote development without displacement. [Gentrification and displacement of lower-income communities are a painful consequence of systemic racism and of our region's exclusionary zoning and subsequent lack of new housing.](#) When high-income neighborhoods refuse to allow housing, renters in all neighborhoods are harmed, and lower-income renters are harmed the most. Displacement is felt acutely in communities of color, given that they frequently face [heavier housing cost burdens](#) than white Angelenos, and typically comprise the majority of the population in gentrifying neighborhoods.

[Abundant Housing LA's policy agenda](#) endorses stronger tenant protection policies, such as expanded affordable unit replacement requirements (“no net loss”) for redevelopment of existing rental properties, a “right of return” after redevelopment at the same rent as before, rental assistance during redevelopment, and a voluntary, negotiated tenant buyout system. Applying these policies citywide would help ensure that lower-income renter households can remain in their communities at an affordable rent, as new housing opportunities are created.

With all this in mind, we find that while the proposed Hollywood Community Plan update offers a modest step in the right direction, **it does not come close to accommodating the Hollywood area's massive need for housing.** While we appreciate the hard work and dedication of the Department of City Planning, and recognize the severe political constraints that make ambitious land use reform challenging, we must nonetheless express our serious concern that this proposal would maintain an unacceptable status quo.

Consider the fact that there are 104,000 homes in the Hollywood CPA today, and that under **current** zoning, the Hollywood CPA has zoned capacity for 121,000 homes. [The Plan would create space for just 11,000 more homes, increasing the zoned capacity to 132,000 homes.](#) By comparison, under [Abundant Housing's FAIR Plan](#), which allocates the City's RHNA target across its CPAs according to objective, quantifiable factors, Hollywood would need to rezone in order to [accommodate 21,000 more homes by 2029](#). Since achieving this amount of housing growth would necessitate an even larger zoned capacity increase (at least twice the housing growth target), **the Plan should have increased zoned capacity by at least 42,000 homes, creating space for a total of at least 163,000 homes.**

[The Plan's stated goals](#) of “[directing] development away from low-density neighborhoods” and “[preserving] single-family residential neighborhoods” are entirely antithetical to expanding housing availability, transit access, and job access for Angelenos of all backgrounds and walks of life. By maintaining low-density, car-centric land use in one of the City's most transit- and job-rich areas, the Plan will make it more difficult for the City to achieve its RHNA target and fails to advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability.

Additionally, we wish to recognize the Just Hollywood Coalition's longtime advocacy for stronger affordable housing provisions in the Hollywood Community Plan update. We agree that the current version of the Plan does too little to encourage affordable housing growth, and we are concerned that elements of the Plan may even undermine the successful Transit-Oriented Communities incentive program.

For these reasons, we ask that the City commit to major revisions to the Hollywood Community Plan through the housing element update process, and to ultimately implement more ambitious zoning and land use reforms that would align the Plan with the housing element update. In the meantime, we've identified opportunities for incremental improvements to the currently proposed Hollywood Community Plan update, in order to encourage additional housing growth, both market-rate and deed-restricted affordable, further reduce car dependence, and generate funds for affordable housing and improvements to transit and pedestrian infrastructure.

Recommendation #1: Ensure that the proposed Community Plan Implementation Overlay (CPIO)'s density bonus and incentive structure is as good or better than Transit-Oriented Communities (TOC) everywhere that the CPIO applies, and allow developers to choose between the Hollywood CPIO and TOC incentives.

We support the Plan's efforts to encourage denser housing production and incentivize on-site, deed-restricted affordable housing construction. The Regional Center 1 (RC1) designation of [the proposed Hollywood CPIO](#) is an improvement over the existing TOC incentives. A project that meets the affordable housing set-aside requirement would be eligible for a 50% increase in FAR, a 100% increase in residential density, and no required residential parking. By comparison, a TOC Tier 3 project is eligible for a 50% increase in FAR, a 70% increase in residential density, and must provide a minimum of 0.5 spaces per residential unit, with the same affordable housing set-aside requirement as RC1. The RC1 incentive structure would make mixed-income housing production more economically feasible, resulting in greater production of deed-restricted affordable homes.

However, in most of the areas where the CPIO would apply, the incentives are less advantageous than those provided in TOC:

- In Corridors areas, projects that meet the affordable housing set-aside are eligible for a 35% residential density increase, and a maximum FAR of 2 to 3.75 (depending on the area).
 - But TOC Tier 1 projects (which must meet analogous affordable housing set-asides) may increase residential density up to 50%, and may build to a maximum FAR of 2.75 (in commercial zones), or build to an extra 40% FAR (in residential zones).
 - TOC Tier 3 projects may increase residential density up to 70%, and may build to a maximum FAR of 3.75 (in commercial zones), or build to an extra 50% FAR (in residential zones).

- In Character Residential areas, projects that meet the affordable housing set-aside are eligible for a 35% residential density increase, but are not eligible for increases to FAR or maximum height. Since Character Residential areas are typically eligible for the TOC incentives today (as they are near Metro and generally zoned R3 or R4), and the TOC incentives allow for increased maximum FAR, the CPIO would do nothing to increase the economic feasibility of housing production in Character Residential areas.

The fact that the CPIO generally represents a downgrade relative to TOC is concerning, since under the proposed Plan, the CPIO incentives would **replace** TOC in the areas where the CPIO applies. The TOC program has been enormously successful in its three years of existence, with [over 30,000 housing units proposed or permitted citywide](#) (of which 21% are affordable to lower-income households). TOC has been [particularly impactful in Hollywood](#), given its high proportion of multifamily-zoned parcels and proximity to transit. Housing opponents, recognizing the effectiveness of TOC in encouraging new housing, [are attempting to pare back or eliminate TOC altogether](#). We fear that the CPIO, as currently designed, would set back the City's efforts to encourage the production of transit-adjacent affordable housing in Hollywood.

Therefore, we urge you to revise the CPIO incentive structure. In all locations where the CPIO applies, residential density bonuses, FAR bonuses, and maximum building heights should be equivalent to or more generous than the TOC program's parameters. Additionally, the option to use the TOC incentives should continue to apply in the CPIO areas. **This would give homebuilders the ability to choose between the CPIO incentives or the TOC incentives, rather than eliminating the option to choose TOC.**

Recommendation #2: Do not reduce maximum building heights anywhere in the CPA.

We are opposed to the Plan's proposed reductions to maximum building heights in many areas of the Hollywood CPA. Under the Plan, permissible building heights would be lowered north and south of Hollywood Boulevard along the National Register Historic District, around the Melrose Hill, Spaulding Square, and Sunset Square Historic Districts, and even on vibrant mixed-use corridors like Melrose Avenue in western Hollywood and Hillhurst Avenue in Los Feliz. The proposed building height reductions on Melrose and Hillhurst Avenues are particularly perplexing to us, as these corridors already have very low height limits that make housing production and redevelopment economically infeasible. If anything, maximum building heights should be **increased** on these corridors.

To our surprise, [Planning's own fact sheet](#) touts these new restrictions as if they were a good thing. Yet these limitations will make it physically impossible or economically infeasible to build new housing or mixed-use projects in the areas with these building height limits, many of which are within walking distance of mass transit and job centers.

We recommend eliminating these proposed new limits on maximum building heights. The Plan should instead regulate maximum building sizes through the FAR limits, and revise existing height limits to **encourage** denser, taller housing production in the Hollywood CPA.

Recommendation #3: Do not expand the boundaries of any Historic Preservation Overlay Zones in the Hollywood CPA.

Planning's fact sheet states that the proposed Plan "supports the establishment and expansion of historic districts, including expansion of the Melrose Hill Historic District." We are opposed to any expansion of Historic Preservation Overlay Zones (HPOZ) in the Hollywood CPA. The Hollywood area already has robust historic preservation policies in place, including the [Historic-Cultural Monument program](#) and the Whitley Heights, Melrose Hill, and Hollywood Grove HPOZs.

HPOZs in particular are a blunt tool for promoting historic preservation. By designating entire blocks or neighborhoods as historic, HPOZs restrict renovation, demolition, or building alterations on all structures in these areas. HPOZs appoint a board to approve all exterior alterations to homes, including relatively minor repairs like painting and window replacement. Some housing opponents, recognizing that HPOZ rules effectively disallow new housing production or renovation, have advocated for the creation or expansion of HPOZs on bad-faith grounds; their goal is to block housing rather than to promote historic conservation.

Furthermore, expanding HPOZs would likely increase housing costs and exacerbate the City's housing shortage. [Studies have found](#) that granting historic status to a building or area [often increases housing costs](#) within the historic zone and just outside of it. Additionally, banning new housing in historic districts, which tend to be proposed in higher-income areas, denies most Angelenos the opportunity to live in these well-resourced neighborhoods and perpetuates *de facto* socioeconomic segregation.

For these reasons, we urge you not to designate new HPOZs or expand existing HPOZs in the Hollywood CPA. Rather, Planning should implement policies that would **encourage** the revitalization of historic structures in Hollywood; the successful Downtown Adaptive Reuse Ordinance shows that it is possible to create more housing and preserve historic buildings simultaneously.

Recommendation #4: Eliminate minimum parking requirements throughout the Community Plan Area, introduce a parking maximum on new construction within a half-mile of Metro stations, and introduce a per-space fee on all existing and new parking lots and garages in the Community Plan Area.

We are pleased to see that the CPIO would eliminate mandatory on-site parking requirements in the Regional Center 1 area of Hollywood. We applaud your team for taking a positive step towards transforming Hollywood into a transit- and pedestrian-first neighborhood.

Minimum parking requirements are a disastrous policy that increase the cost of construction, harm the economic feasibility of housing production, encourage car dependence, and jeopardize pedestrian safety. The City of Los Angeles already has a massive oversupply of parking spaces; [researchers estimate that it has over 6 million parking spaces](#), or 1.5 spaces per resident, including children. Existing parking is adequate to accommodate future Hollywood population and job growth, especially as greater adoption of mass transit and autonomous vehicles/mobility-as-a-service make car ownership less common.

Unfortunately, the Plan does not go nearly far enough in paring back this harmful mandate. It keeps minimum parking requirements in place outside the Regional Center 1 zone, and relative to the TOC incentives, it does not reduce minimum parking requirements in most areas where the CPIO applies. Los Angeles needs to prioritize homes for people over homes for cars, particularly in neighborhoods like Hollywood that are well-served by a growing network of rail, bus, and protected bike lanes. As a first step, **minimum parking requirements should be eliminated throughout the Hollywood CPA**. Going forward, owners of new residential and commercial projects should be free to determine how much, if any, on-site parking to provide.

Additionally, we recommend introducing a parking **maximum** on new construction within a half-mile radius of Hollywood's Red Line Metro stations. In the case of residential development, this policy should cap on-site parking to a maximum of one parking space per new housing unit. This policy is necessary because even in the absence of an on-site parking requirement, risk-averse bank lenders and investors are still likely to insist that new projects maintain a high level of on-site parking, limiting the impact of eliminating on-site parking minimums.

Finally, the City should also introduce a per-space fee on all existing and new parking lots and garages in the Hollywood CPA, which would create a revenue stream to fund affordable housing, streetscape improvements, better pedestrian safety infrastructure, higher-quality mass transit, and a program to facilitate better parking management (which will increase the accessibility of existing surplus parking spaces). This policy would also encourage the redevelopment of existing lots and parking structures into new homes and businesses, further establishing Hollywood as a hub of economic activity and vibrancy.

Parking maximums are far from an untested policy. They have been successfully implemented throughout [London](#) and [Mexico City](#), and in parts of [San Francisco](#) and [Oakland](#). Mexico City's policy requires developers to pay a fee if they build more than 50% of the maximum parking allowed. Revenues from the parking fee are used to improve transit and subsidize housing.

Eliminating on-site parking requirements throughout the Hollywood CPA, and introducing parking maximums near Metro would make housing more affordable, encourage mass transit usage, walking, and biking, and reduce pollution and carbon emissions. The City has wisely eliminated on-site parking requirements in the proposed Downtown Community Plan, and we urge you to do the same in Hollywood.

Recommendation #5: Commit to updating the Vermont/Western SNAP within one year, which should include an ambitious rezoning of low-density areas and commercial corridors within the Los Feliz neighborhood.

The Vermont/Western Station Neighborhood Area Plan (SNAP) is a transit-oriented Specific Plan that was implemented in 2001. The SNAP covers the blocks around three Red Line Metro stations, including portions of Los Feliz. Despite the fact that 20 years of significant change in Los Angeles have occurred since the adoption of the SNAP, including strong job growth in Hollywood, no major changes were made to the SNAP in the context of the Plan. For example, the proposed CPIO does not apply anywhere within the SNAP area.

The City should commit to updating the SNAP by the end of 2021, in order to encourage more housing production, both deed-restricted and market-rate. This is particularly necessary in Los Feliz, one of the City's most vibrant, walkable, and popular neighborhoods. Los Feliz's census tracts are defined as high- and highest-resource areas in the [TCAC/HCD Opportunity Map](#), and it is within close proximity of mass transit, schools, parks, and Hollywood and Downtown job centers. Yet [as a result of past downzoning](#), low-density land uses are generally mandated; RD1.5 and R2 zones and low maximum building heights are common, even in areas where "missing middle" housing was once legal to build. As a result, [just 87 new homes were built in Los Feliz between 2013 and 2019](#), and the median cost of a two-bedroom home increased 154% since September 2013, more than any other neighborhood in Los Angeles.¹

Los Feliz's R1, R2, and RD1.5 zones, outside of Very High Fire Hazard Severity Zones, should be rezoned to allow mixed-income, mid-rise apartment production, and maximum FARs and building heights should be increased on Vermont Avenue, Hillhurst Avenue, and Hollywood Boulevard. Additionally, assuming that the CPIO is strengthened per Recommendation #1, its boundaries should be expanded to cover Los Feliz, so that affordable housing production incentives would apply (currently, TOC provisions do not apply in some parts of Los Feliz).

We look forward to further engagement with you on this critical effort, and are happy to meet with you at any time to discuss these policy proposals. Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA

¹ [Zillow Home Value Index, 2BR Time Series by Neighborhood](#)



Hollywood Community Plan Update 2 - CPC February 18

Brian Dyer <bwdyer@hotmail.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Tue, Feb 16, 2021 at 7:57 AM

Los Angeles City Planning Commission

Community Planning Bureau

[200 N. Spring Street, Room 667](#)

[Los Angeles, CA 9001](#)

hollywoodplan@lacity.org

Re: Hollywood Community Plan Update;:

Members of the Community Planning Bureau

The Hollywood Community Plan Update 2, being considered by Planning on February 18, 2021 should be rescheduled for a later date.

1. With the release of the February 2021 Hollywood Community Plan Update having just been released on February 2, 2020, Neighborhood Councils are left without time to comment on the release of the draft that will affect their communities. Fourteen days is not enough time, with Brown Act provisions of seventy-two hours' notice for their communities, and a national holiday truncating an otherwise nine business day comment period down to eight.

Indeed, the lack of regard continues in that nowhere, in the Community Plan document are the names of the Neighborhood Councils respectfully named. They could be so, on Section 2, page 2, where the Hollywood Chamber of Commerce and the Hollywood Entertainment Business District is mentioned in a call out, but they are not. The term "neighborhood councils" aren't even capitalized.

This letter is not in behalf of the neighborhood councils, but as a stakeholder who participates in Please note, the City's designated process of comment and advisory from stakeholders to the City leadership.

2. In the description for Multiple-Family Residential (3-13), many requests have been made to downzone the Heights of the specific area mentioned, east of Highland Avenue, north of Hollywood Boulevard, west of Cahuenga Boulevard, and south of Franklin Avenue. In another section of Hollywood Community Plan Update2, it is stated that historical preservation is being sought and protected. It also states that this are of Hollywood has the second, densest area of historic contributors in the City. So, how can the plan on one hand, state that it is preserving history, while on the other, encouraging tear downs for density?

3. The City Planning Commission announcement stated that it was not promoting any development project. However, the Hollywood Community Plan Update 2 supports the 101 CAP Park, a private development project. The park would have to be built over the Hollywood Fault, which is active, according to the State of California, but inactive, according to the private developer studies that want to build the Park. The City is being dishonest and building corruption into the Plan.

Respectfully submitted.

Brian Dyer



HOLLYWOOD COMMUNITY PLAN UPDATE COMMENTS/ case number (CPC-2016-1450-CPU)

Brian Folb <Brian@hollywoodoffices.com>

Tue, Feb 16, 2021 at 12:37 PM

To: "cpc@lacity.org" <cpc@lacity.org>

Dear LA City Planners,

We commend planning staff on innovating from the last draft in creating the public open space incentive tool for non-residential uses. Hollywood is already an open-space deprived neighborhood, so this tool helps provide greater equity with the plan for supporting job creation while providing a sorely needed community benefit. However, there are certain provisions of the open space requirement, such as the restroom requirement, which will make this tool operationally challenging and may likely inhibit its utilization.

The latest draft of the CPIO includes some significant improvements to the current, litigious climate for entitlements. These lawsuits add time and cost to projects which only result in higher rents and challenges to affordability. In particular, increasing the threshold for site plan review to 200 units for residential projects that hit their inclusionary mark is a huge step forward. However, there is a need in the plan to also reference a corresponding building area threshold of 200,000 square feet as the current threshold for site plan review includes both a massing figure and unit counts. Additionally, the same consideration should be applied to nonresidential buildings qualifying for density bonuses through the provision of publicly-accessible open space.

Area stakeholders spent years working with City Planning staff to help inform the base FAR map recommended by planning staff in the August 2020 CPIO draft. The stark reductions in base FAR included in the Feb 2021 draft of the CPIO for about half of the regional center, motivated by the regional housing crisis, disregards the years of progress made in strengthening Hollywood's role as an employment center and economic generator for the City of LA. Inside the regional center, there are currently 735 income-restricted affordable housing units, which amounts to 11% of the total housing stock. Moreover, 14% of residential units in the pipeline (613 units) are affordable. Hollywood continues to address a disproportionate share of the City's affordable housing crisis, and that burden should not unfairly spread across the regional center at the expense of other critical land uses such as places for people to work, create and perform. If the rest of the City of LA was building at Hollywood's level, there would be over 200,000 units of affordable housing in the pipeline across the city. This plan should honor the years of work that went into creating the August 2020 base FAR map and not overcorrect in a manner that has severe consequences to other essential land uses. Further, reducing the FAR inhibits the viability for market rate developers to include more "affordable" units.

Expanding allowable ground floor land uses through a change from C4 to C2 zoning opens up the opportunity for more businesses and creative uses to fill vacant storefront space inside the regional center. Before the pandemic, the regional center area had a 20% vacancy rate for ground floor space, and we've lost approximately 50 more businesses through the pandemic. We'll need innovation and creativity to help backfill those spaces.

For qualifying projects, removing parking from the auspices of zoning makes a tremendous amount of sense. Investors and developers are best poised to assess the amount of parking needed to support their projects, and given the dynamic and evolving nature of mobility preferences, should be empowered to make that type of decision rather than it be calculated by a rigid land use tool.

There is a major opportunity lost in not powering-up the transferable density tool by enabling more FAR to be transferred from historic properties. Considering the rough condition of and seismic retrofit needs for some of our most troubled

historic assets, it is rational to increase the allowable heights within the historic district to create more value that can be invested into the retrofit and preservation of these assets while enabling greater density elsewhere within the plan area that does not detract from the integrity of the historic district.

Brian Folb

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February 16, 2021

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

Re: Hollywood Community Plan Update, EIR, CPIO, and Associated Documents/Approvals
Case No.: CPC-2016-1450-CPU
CEQA No.: ENV-2016-1451-EIR

Members of the City Planning Commission,

In these comments, United Neighborhoods for Los Angeles (UN4LA) presents a summary of its objections to the proposed Hollywood Community Plan Update, the associated EIR, and Community Implementation Overlay, as well as concerns related to other associated approvals. Please see below for our detailed comments.

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

Hollywood Community Plan Update

We understand that the Plan is meant to provide a broad vision, but the vision laid out in the Draft HCPU fails repeatedly to acknowledge the real challenges that Hollywood (and the City at large) is facing. In its current form the Plan fails to acknowledge serious issues related to declining transit ridership, infrastructure, public services and utilities. The HCPU makes no meaningful effort to address homelessness, which has increased significantly in Hollywood. And while the pandemic was a health emergency that could not be foreseen, many observers believe that it could alter urban land use dynamics with regard to the need for housing, commercial space and office space. A supplement to the Plan must be prepared to acknowledge changes that may have already begun to occur as a result of the pandemic.

Draft Environmental Impact Report

We object to the fact that the CPC is holding this hearing when the FEIR has not been released. It is difficult for Hollywood area residents to make informed comments regarding this process when a key environmental document is not available. The DEIR's analysis is incomplete or inaccurate in the following areas:

Air Quality & Greenhouse Gas Emissions: In both cases the assumptions made regarding the relationship between land use and transit are false with regard to impacts on air quality. In spite of substantial new residential development near transit hubs, transit ridership on both Metro and DASH lines has been declining for years. The City has presented no data to support its claims about increased active transportation.

Hydrology: LA's hydrology is changing, along with that of the State of California. As of February 11, 2021, the US Drought Monitor (<https://droughtmonitor.unl.edu/>) shows that almost the entire state is experiencing conditions ranging from abnormally dry (LA area) to extreme drought (Inyo and San Bernardino). LA's average annual precipitation over the last 20 years is lower than 20th century averages, snowpacks are below their historic averages, and negotiations continue as to how to cope with declining deliveries from the Colorado River. At the same time, the HCPU envisions robust population and commercial growth.

The DEIR makes no effort to assess the impacts of likely reductions in deliveries from the LA Aqueduct, the State Water Project, and the Colorado River. It also proposes no programs or mitigation measures to deal with reduced water deliveries to the Hollywood area.

Population, Housing, Employment: The EIR acknowledges that the 1988 HCP allows more than enough zoned capacity for planned growth through 2040, but the current update proposes massive upzoning. The Plan appears to be growth inducing.

Transportation/Traffic: The DEIR fails to acknowledge that ridership on transit lines serving the Hollywood area have been declining since 2014. The DEIR presents no data to support claims about active transportation.

Utilities/Service Systems: The City is currently out of compliance with AB 939, which requires cities to divert 50% of solid waste to recycling. New multi-family and commercial projects will be served by the Zero Waste LA Franchise System, which currently diverts less than 35% of solid waste to recycling. If the area grows in line with the Plan's assumptions, this problem will be exacerbated. By inaccurately claiming 50% diversion, the DEIR fails to accurately assess GHG emissions produced by disposing of solid waste in landfills.

Community Plan Implementation Overlay

The generous density incentives offered by the CPIO (100% in the Regional Center) could result in substantial additional housing density that was not analyzed in the DEIR. The CPIO states that projects which comply will be approved ministerially, with no CEQA review. The CPIO's changes to Site Plan Review requirements, setting new thresholds up to 200 units, could also allow substantial increases in density with no CEQA review. The inclusion of these provisions in the CPIO, after the release of the DEIR, represents an illegal effort to circumvent CEQA. The CPIO's incentives will likely spur new development in the Regional Center, but since the area is largely built out with RSO apartment buildings, new projects will likely result in substantial displacement of tenants. Existing density incentives have not produced significant gains in housing accessible to low-income households. Since the LAMC allows developers to count replacement units toward affordable requirements, net gains in housing accessible to low-income households are likely to be negligible.

Recommendation Report

The Recommendation Report only makes brief mention of the impacts of the pandemic, and does not acknowledge the possibility of significant changes to the Hollywood area's needs in terms of housing, office space, retail and hotel accommodations. Even before the pandemic, demographic data showed that LA County was experiencing a net loss in population. In the aftermath of the pandemic, the Hollywood area could see reduced demand for housing, office space and commercial space. The Recommendation Report does not make any effort to address these changes, rendering its recommendations questionable, at best.

Gutting of the Hollywood Redevelopment Plan

UN4LA opposes the proposed ordinance to gut the Hollywood Redevelopment Plan, which could well impact affordable housing requirements and historic resources.

Possible Violation of LAMC Sec. 11.5.8.

LAMC Section 11.5.8 is clear in stating that no amendments or changes may be made to a plan area until the completion of a comprehensive housing assessment by the Planning Department, including the creation of an inventory of affordable and RSO units, and the development of a monitoring program to assess housing progress. We have so far seen no such inventory.

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February 12, 2021

VIA EMAIL ONLY: cpc@lacity.org

Samantha Millman, President
City Planning Commission
200 N. Spring Street, Room 667
Mail Stop 395
Los Angeles, CA 90012

Re: 2864 Cahuenga Boulevard
Request for General Plan Amendment and Zone Change in Connection with Hollywood
Community Plan Update (Case No. CPC-2016-1450-CPU)

Dear President Millman and Honorable Commissioners:

This office represents Ben Forat with respect to his ownership of the undeveloped property located at 2864 Cahuenga Boulevard (the "Property") in the Hollywood Community Plan (the "Community Plan") area. The Property is comprised of six (6) contiguous parcels totaling approximately 805,906 square feet (or 18+ acres). It is situated just east of the 101 Freeway and Cahuenga Boulevard, immediately south of Lakeridge Road and west of Hollywood Reservoir. This correspondence follows our letter dated August 25, 2020 **requesting that the City of Los Angeles (the "City") study and approve a Zone Change to RD3 or greater and General Plan Amendment to Medium Residential for the Property, or a portion of the Property, in connection with the anticipated Hollywood Community Plan Update ("HCPU2").**

A. The Property's Land Use Designation and Zoning Should be Updated

The Property is adjacent to high intensity uses and transit, with no nearby development that is consistent with anything close to the existing RE40 zoning. See Exhibit A. There is no clear policy or planning and zoning reason to justify a RE40 zone for the Property. The 101 Freeway is immediately to the west, separated only by Cahuenga Boulevard, and to the south are high density condominiums and townhomes. Single family homes are to the north and east, and commercial uses border both sides of the 101 Freeway. The site is within close proximity and walking distance to major transit, shops, and employment.

The HCPU2 is the required time to revisit the zoning and appropriate land uses for the Property to match the actual land use patterns in the area. Justification exists to amend the Community Plan to replace the outdated and inefficient Minimum Residential land use designation with workforce

Samantha Millman, President
City Planning Commission
February 12, 2021
Page 2

and affordable Medium Residential uses. Doing so is consistent with the draft HCPU2's goals and policies that promote complementary residential development, creative infill, and compatibility with adjacent development. A concurrent Zone Change should also be processed to transform the Property's RE40 zoning into RD3 zoning or greater so that it corresponds with the more intensive and practical land use designation.

As shown on the HPCPU2 General Plan Land Use Map, maintaining the Property's Minimum Residential land use designation is illogical, impractical, and constitutes illegal inverse (or reverse) spot zoning. The Map shows Low I and Low II uses directly to the north and east and Medium Residential uses directly to the south. Although the Property was rezoned to RE40 in the 1980's along with other properties within the Community Plan area, the subject Property does not connect with any other RE40 zoned properties; it sits alone as the sole RE40 zoned property otherwise surrounded by more intensive uses. Here, the City must take this HCPU2 opportunity to up zone the Property to align with the neighboring development pattern.

B. Designating the Property for More Intensive Residential Uses Will Help Alleviate the Housing Shortage

The subject Property is perfectly positioned for the development of multi-family housing. It is both impractical and illogical to consider that residential estates are a better "fit" for the site. The City and the State are in the midst of a critical housing shortage. The Executive Summary of the City's Housing Element Update 2021-2029 states clearly that the "City of Los Angeles continues to grow, and with that growth comes the need for more housing – not only more units, but a broader array of housing types to meet evolving household types and sizes, and a greater variety of housing price points that people at all income levels can afford." Failing to update the zoning and land use designation for the Property will result in consequences that the Housing Crisis Act and Housing Accountability Act expressly intend to avoid: "lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration." Gov't Code §65589.5(a)(1)(C).

C. Conclusion

HCPU2 must designate the subject Property for Medium Residential use, consistent with at least a RD3 zone, as is the long standing development pattern on the immediately adjacent properties. Thank you in advance for the Commission's consideration of this request. We are available as a resource during the HCPU2 process and to respond to any questions.

Sincerely,

GAINES & STACEY LLP

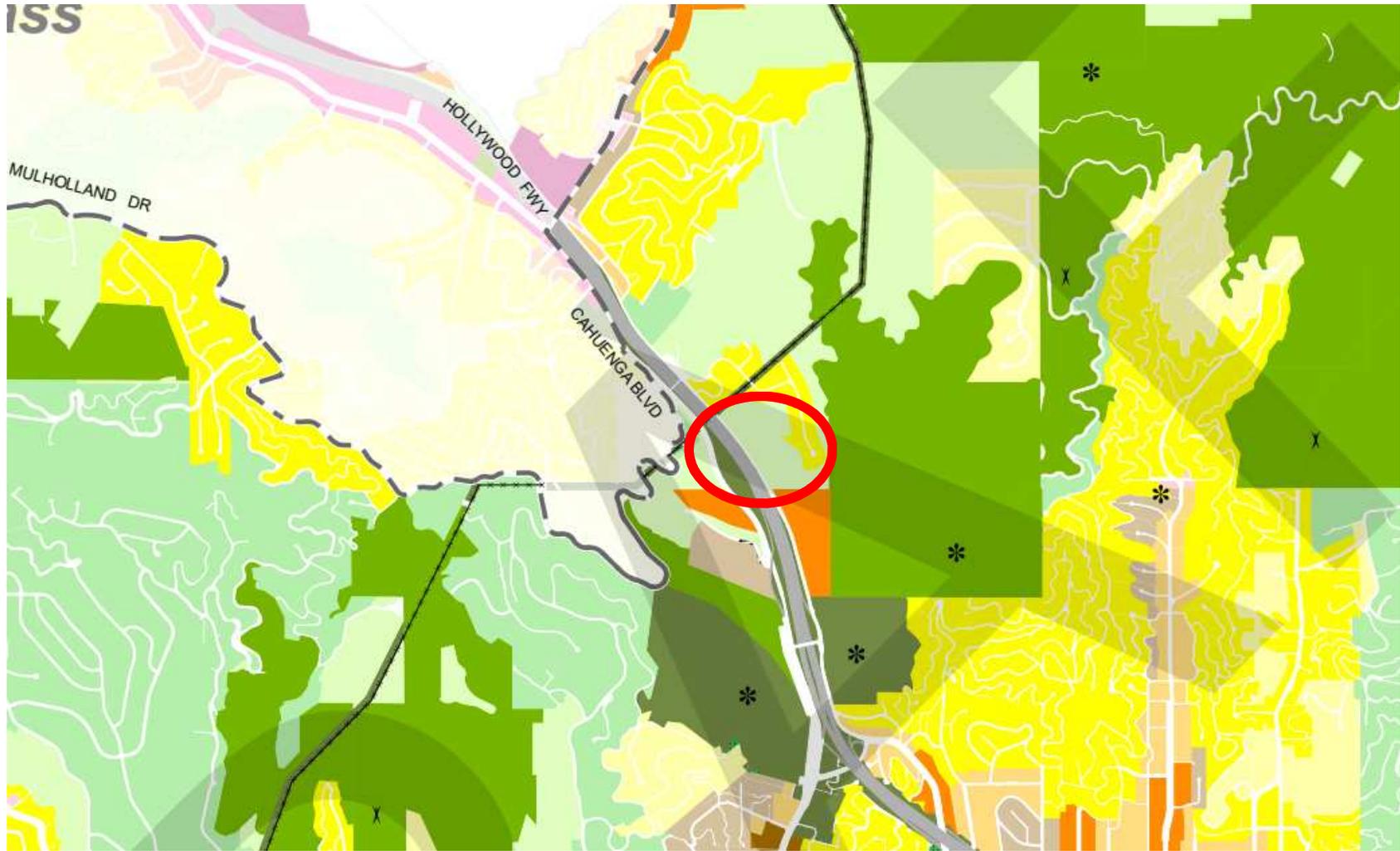
Fred Gaines

By
FRED GAINES

Samantha Millman, President
City Planning Commission
February 12, 2021
Page 3

cc: Shana Bonstin – Deputy Director (Via Email shana.bonstin@lacity.org)
Craig Weber – Principal City Planner (Via Email craig.webber@lacity.org)
Rachel Fox – CD4 (Via Email rachel.fox@lacity.org)
Meg Healy – CD4 (Via Email meg.healy@lacity.org)

Exhibit A





Gonzales Law Group, APC

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Michael Gonzales

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February 16, 2021

VIA EMAIL ONLY

Los Angeles City Planning Commission
Los Angeles City Hall
200 N. Spring Street Room 272
Los Angeles, CA 90012
Cpc@lacity.org
Attn: Cecilia Lamas, Commission Executive Assistant

RE: CPC-2016-1450-CPU; ENV-2016-1451-EIR

Dear Commissioners:

This firm represents Roberto Valentino, LLC (“RVLLC”), the owner of those certain parcels of real property commonly referred to as 7038 – 7032 Sunset Boulevard and 1433 – 1445 Sycamore Avenue (the “Property”). The Property is located in the transit rich Hollywood community of the City of Los Angeles (“City”). The Property is currently improved with a single story structure and a surface parking lot and is ripe for future redevelopment. The Property is located approximately 1750 feet from the Metro B Line entrance at Hollywood and Highland and is served by bus routes along both La Brea Avenue and Sunset Boulevard.

The Property is subject to the Hollywood Community Plan Update (the “Update”) that is before you on February 18, 2021. First and foremost, on behalf of this firm and on behalf of RVLLC we applaud Los Angeles Department of City Planning (“LADCP”) Staff for their tireless and enduring effort at bringing the Update back before this Commission. The Update maintains the Property’s Regional Center Commercial land use designation. The Update, however, reflects the Property as located in Update Sub Areas 92 and 1002. Both Sub Areas defer development regulations to the proposed Community Plan Implementation Overlay (“CPIO”), which is also before you on February 18, 2021.

The CPIO designates the Property as Regional Center 2 (“RC2”). The Update notes that the Regional Center Commercial land use designation comprises only 2 percent of the Update’s land area. A good part of the Regional Center Commercial land use designation rests within the boundaries of the historic Hollywood Boulevard Commercial and Entertainment District, a

Nationally Registered historic district. This portion of the Regional Center Commercial land use designation will not see anything close to the level of intensity and density that other parts of Hollywood will see because the district's low rise nature is not conducive to intensity and density. Accordingly, it is imperative that the Update carefully consider development potential for those parts of the Regional Center Commercial designation that are not subject to historic constraints.

Currently, that portion of the Property identified as 7038 – 7032 Sunset Boulevard is zoned C4-2D-SN and that portion of the Property identified as 1433 -1445 Sycamore Avenue is zoned P-2D, which is an antiquated parking zone. The Update proposes to rezone the P-2D portion to [Q]C2-2D-CPIO. The Update also proposes to revise the C4 portion to C2. RVLLC appreciates LADCPs Staff recognition that the P zone is antiquated and appreciates the change to C2 zoning. Eliminating the P zone modernizes the Property's zoning and will allow for more efficient and productive use of the Property, which is surrounded by highly urbanized and dense uses. As noted earlier the entire Property is subject to the CPIO RC2 development regulations, which impose a maximum floor area ratio ("FAR") of 3 to 1 for mixed use projects that include some level of affordability. The CPIO must be revised to allow an increased FAR of 3.75 to 1.

Under current zoning and utilizing the City's Transit Oriented Communities ("TOC") program, the Property could achieve a floor area ratio ("FAR") of up to 3.75 to 1.¹ We believe an FAR of 3.75 is appropriate for the Property because it is located on Sunset Boulevard (a major transit corridor), near La Brea Avenue (another major transit corridor) and is approximately 1/3 of a mile from the Hollywood and Highland Metro station. The Property's transit richness is recognized by the TOC program, which designates the Property as Tier 3. As you know, the TOC program rewards transit richness by increasing development incentives with proximity to transit.

The CPIO creates an incentive program that replaces TOC within the CPIO area. As noted above, the CPIO designates the Property RC2. The RC2 designation allows a maximum residential density of 1 unit for every 200 square feet of lot area (which is currently allowed for mixed use project pursuant to LAMC Section 12.22.A.18) for residential only projects. Mixed use projects are incentivized by allowing a residential density of 1 unit for every 115 square feet of lot area. To achieve either density, a project must set aside a specified percentage of affordable dwelling units. While the CPIO seeks to increase density, achieving the permissible density is not feasible because the maximum permissible FAR is 3 to 1. Under current zoning using the TOC program, the Property could support an additional 25,000 square feet of floor area, which translates into an additional 30 or so dwelling units (assuming an average size of 750 square feet per unit).

The CPIO leaves a tremendous amount of density on the table in a transit rich location at a time when we face an escalating housing crisis. The Property is an easily walkable 1/3 of a mile from the Hollywood and Highland Metro station. The CPIO must recognize this reality and allow for additional FAR at this location. Similarly situated property along Sunset Boulevard but near the Vine Street Metro station can achieve an FAR or up to 4.5 to 1 using the CPIO's

¹ TOC Guidelines Section VI.b.iii.

affordable incentives. Like the Property, those properties are also designated Regional Center Commercial, and like the Property, those properties are also located within an easily walkable 1/3 of mile from the Vine Street Metro station. The CPIO cannot favor proximity to transit near Vine Street while disfavoring the same proximity near Highland Avenue.

While the CPIO imposes a 3 to 1 FAR for mixed income projects (i.e., market rate with an affordable component), the CPIO does allow for an FAR of up to 3.75 to 1 but only for 100 percent affordable projects. There is no question that the City desperately needs more affordable housing, but the CPIO's approach could disincentivize housing production. As noted above a mixed income project cannot maximize the Property's density because of the CPIO's FAR restriction. This significant handicap places the Property at a disadvantage when compared to similarly situated property along Sunset Boulevard near Vine Street. Traditional housing developers could perceive this handicap negatively and forego developing the Property with housing product. A 100 percent affordable housing project, however, can more effectively utilize the Property's density because of the increased FAR. 100 percent affordable housing projects are tremendously difficult to finance and typically require a significant public subsidy to implement. Accordingly, while a laudable goal a 100 percent affordable housing project on the Property is not realistic given the financing hurdles. The CPIO has placed the Property in a policy tug-of-war that may result in no housing production at all. The CPIO must be revised to allow an FAR of up to 3.75 for mixed income projects as well.

Updating a community plan is no easy task, especially the second time around. Again, we applaud LADCP Staff for their efforts at modernizing the Hollywood Community. We, however, believe that the Property's proximity to mass transit systems justifies a 3.75 FAR. We respectfully request this Commission instruct LADCP Staff to revise the CPIO accordingly.

Very truly yours,



Michael Gonzales
Gonzales Law Group APC

CITY OF LOS ANGELES
HOLLYWOOD STUDIO DISTRICT
NEIGHBORHOOD COUNCIL

Officers:

John Franklin Sierra, Chair
Grace Cotangco, Vice Chair
Anthony Conley, Treasurer
Damien Burke, Secretary

5500 Hollywood Blvd. #313
Los Angeles, CA 90028
info@hsdnc.org
www.hsdnc.org



ERIC GARCETTI
MAYOR



Board Members:

Frankie Holt	Milton Cruz
Laura Graves	Bill Murphy
Damien Burke	Kate Pynoos
Anthony Conley	Benjamin Rosen
Grace Cotangco	John F. Sierra
<i>Vacant</i>	Rosalinda Sierra
Doug Haines	Michael Tessler
Dassler Jimenez	Theodore Wachtel
Guy Langman	<i>Vacant</i>

February 12, 2021

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

RE: CPC-2016-1450-CPU; ENV-2016-1451-EIR. Hollywood Community Plan Update. Scheduled as item number 6 on the Commission's 2-18-21 agenda.

The Governing Board of the Hollywood Studio District Neighborhood Council (HSDNC) voted at its February 8, 2021 regular meeting to recommend that the City Planning Commission and Los Angeles City Council impose an inclusionary housing requirement within the Hollywood Community Plan Area on all new residential and residential mixed-use projects with ten or more dwelling units. The Board recommends that the inclusionary housing requirement be in lieu of the City Planning Department's current proposal of a Community Plan Implementation Overlay (CPIO) District that would replicate Transit Oriented Communities (TOC) incentives.

The Board recommends that an inclusionary housing requirement mandate that 15% of all rental units be dedicated to affordable housing for Low or Very Low Income tenants.

As an alternative to requiring that all projects of ten or more units include affordable housing, the HSDNC Board recommends that there be an optional in-lieu fee payment, and that this fee payment be calculated on liveable area and be in compliance with an annually updated city fee schedule.

The vote of the Board to support an inclusionary housing requirement within the Hollywood Community Plan Area was seven to two, with three abstentions.

Thank you,

John F. Sierra, Chair
Hollywood Studio District Neighborhood Council

CITY OF LOS ANGELES
HOLLYWOOD STUDIO DISTRICT
NEIGHBORHOOD COUNCIL

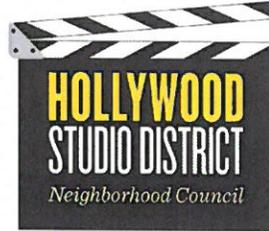
Officers:

Vacant, Chair
Keith Cornella, Vice Chair
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Board Members:

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Jonathan Bayley	Kate Pynoos
Damien Burke	Benjamin Rosen
Anthony Conley	John F. Sierra
Keith Cornella	Rosalinda Sierra
Craig Cox	Michael Tessler
Doug Haines	Theodore Wachtel
Dassler Jimenez	Tabatha Yelos
Anita McMillan	Vacant
Bill Murphy	Vacant

December 9, 2019

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

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

The Governing Board of the Hollywood Studio District Neighborhood Council voted at its November 11, 2019 regular meeting to support the Hollywood Coalition in its request for amendments to the proposed Hollywood Community Plan Update. The vote of the Board was seven members in support of the request, one opposed, and five abstentions.

The vote of the Board is to request the following Plan Update amendments:

- 1) No demolition, grading, or building permits shall be issued until a Project Permit Compliance Review has been completed by the Department of City Planning.
- 2) Require that any Rent Stabilized Ordinance (RSO) residential units that are to be removed for a new Project be replaced on a 1:1 basis within the new development, and prohibit the inclusion of RSO units from the calculation of a Project's Base Density.
- 3) Prohibit the removal of RSO units for condo conversions or small lot subdivisions if the residential rental vacancy rate within the Plan area is less than 5%. Further require that the residential vacancy rate be updated annually.
- 4) Prohibit the conversion of RSO units into hotels or apartment hotels.
- 5) Eliminate existing [Q] qualifying conditions that allow hotels to be developed by-right.
- 6) Allow hotel approvals to be appealable directly to the city council.

7) Maintain the existing Floor Area Ratio (FAR) limitations in the Plan subareas, including but not limited to subareas 4:4, 4:4A, 6:1, 6:2, 6:4, 19, 19:4, 40:5, 41, 41:1, 42:1, 42, 42:2, 43.

8) Support local hiring requirements, living wage provisions, and job training.

9) Support the retention of small businesses.

Prior to the vote of the Board, a representative of the Hollywood Coalition presented the requests and answered questions regarding the proposal.

Thank you,



Keith Cornella,
Chair Pro Tempore/Vice Chair

Heritage Properties

City Planning Commissioners
Mr Craig Weber and Ms. Linda Lou,
Email: linda.lou@lacity.org
Email: cpc@lacity.org

Re: CPC 2016-1450-CPU

Dear All:

A revised version of the Hollywood Community Plan Update was issued with untracked changes around February 5, 2021. This letter includes a summary of my comments in 4 categories.

I include by reference my letter submitted on time for comments on the DEIR. I recognize many achievements in this HPCU, from technology advances to make the proposed Plan interactive; to a well-meaning attempt at neighborhood protection for Character Residential; to a real try at laying out a TDR program; to a first- time- for- Los Angeles Preservation Chapter; to cleaning up long-standing mapping inconsistencies with public facilities and removing churches. I have a high regard for the individuals involved, and recognize real contributions.

For tackling substantive underlying major issues, I recommend the Planning Department correct #1 and 2, and the Planning Commission either delay the review of the HPCU package until concerns in #3,4, and 5 are fully addressed, or condition the furtherance of the Plan going to the PLUM Committee on resolving all 5 of these concerns:

1. **Correct continuing demographics/population problems from HPCU rejected by Judge Goodman:** I am not an expert in the prior case, but my understanding is that the judge found CEQA errors—in demographics and the population and plan capacity calculations, and in some details of traffic and transportation. This is not a frill. Demographics and population calculations are the bedrock of the START of a Community Plan. From my read of the current HPCU, the demographics are not handled at all.
2. **Correct misleading flyers/ staff reports, etc:** The continuing public announcements from City Planning are inaccurate, and I encourage you to immediately correct before the Planning Commission hearing: #1 The HPCU and CPIO does not include “preservation” and “innovative strategies to promote preservation of historic resources” - City proposes to do continue what it always been doing at the office of Historic Resources, but reduce dramatically the protections and guidance for dealing with Hollywood’s historic buildings and #2 transit-oriented planning is not a new feature of this Plan--density at the transit stops was a fundamental and integrated part of the 1988 Community Plan, provided at densities twice Century City. This plan increases density even more while exacerbating associated problems.
3. **Cancel deceptive newly proposed Ordinance Exhibit I:** A third deception is the Ordinance added as the last Exhibit of the 497 page package (Exhibit I) --misrepresented as a “clarification” of the relationship of the City’s new HPCU to the Hollywood Redevelopment Plan strictures. This Ordinance removes all CRA-required historic building protections, as well as all land planning obligations transferred to the City from the Community Redevelopment Agency. As Redevelopment Plans were by law more restrictive than the City’s General Plan and Community Plans, this is a wholesale removal of obligations to the public legislated to be in effect until 2028- with no explanation, equivalency offered, and no environmental review.

Heritage Properties

4. **Resolve significant problems in DEIR:** A proposed newly revised February 2021 Plan is being sent to the Planning Commission prior to a raft of new substantive additions and changes from the time of DEIR circulation and no sign of reconciliation of the extreme problems in the DEIR. The conclusion of significant adverse impact on historic resources as “unavoidable” is prima facie untrue, as described below, and the Plan can be corrected as noted below. A Statement of Overriding Considerations is unsupportable. The “No Project” Alternative (misleading- it was a “keep the 1988 Community plan zoning” “no new upzoning project” alternative) is the only credible environmentally superior option. The public has been locked out of discussion with public comments—such as mine—unavailable to others. The purpose of CEQA is to bring the knowledge and concerns of the wider public into a “project” before it is fully cooked. This HPCU EIR arrived as a justification of upzoning all through central Hollywood; it was rejected by the courts as defective; and it was rolled out again absent calculations and less analysis and transparency than the rejected version. Without serious numbers this isn’t a plan.
5. **Stop Rush to Commission:** Issuing the 4th complete Plan revision, adding an Ordinance and other items, on February 5 for a hearing on Feb 18 is unconscionable. City Planning had in meetings with constituents for this Plan stated this would happen in summer.

I address you having been a planner at Gruen Associates who prepared the 1988 Hollywood Community Plan, and thus as an expert on its contents. (I was not responsible for the AB283 zoning effort, but believe I am the only person to have ever mapped the D conditions which resulted from it—in other words who understands what the Community Plan zoning that the HPCU proposed to change.)

I am also an historic architect with 50 years experience, having restored and adaptively re-used some of our region’s most important landmarks; a real estate investor and developer having developed affordable housing and owned many apartment and historic properties in Los Angeles and Oregon; and a founder and continuing advocate for Hollywood Heritage.

This Plan is not ready for prime time. This letter may appear to have a short tone, and that is not my intent. Rushed by a deadline and too much is at stake. Please contact others who may contribute to correcting and strengthening the Plan so that Hollywood does not decline as a result of it. When I prepared the 1988 Community Plan, and we planimetered and walked every street, what became so abundantly clear was that Hollywood’s neighborhoods and streets which had lopsided postwar growth had ended up as blighted, while the few neighborhoods islanded and consistent in their buildings and zoning had prevailed.

What I see as an architect and developer as a constant user of plans and codes, and as an author of plans, is great aspiration and intent, but an inordinate degree of vagueness, missed issues, impossible interpretations, inconsistent definitions, wrongly placed discretion, etc.

#1 CORRECT CONTINUING PROBLEMS IN HPCU REJECTED BY COURT:

The existing 1988 Plan isn’t “outdated”—the existing Plan capacity isn’t calculated in the HPCU as required as the starting point under the General Plan Framework : The General Plan framework requires that the first step in starting the Hollywood Community Plan process is calculating the remaining capacity from the 1988 Plan.

“Outdated” would mean that the current plan did not have the capacity for growth as projected by SCAG and other relevant agencies. But it does. “Outdated” would mean that the density was not gathered near transit- but it always was. “Outdated” would mean that the Plan Elements- such as traffic and

Heritage Properties

transportation and infrastructure—were not keeping up with growth. That is the part that is outdated. Upzoning doesn't solve that.

The public is being denied access to the fundamental underlying issue of any Community Plan—matching people to buildings. The on- line resources, maps, etc eliminate information on the current Plan and zoning, and the current Plan capacity. To correct this:

- The Plan on line has the 1988 Plan Text—must include the FEIR with the actual population and building computations.
- The Plan on line must include the missing map of the current zoning, including the effect of D conditions.
- The maps offered on line to the public show proposed changes. The public is asked- “how do you like it?” rather than “is this a justifiable and desirable change?”
- The Planning Department has – with each of 4 different releases—removed information and transparency. The current Interactive Map, the Zoning matrix, and the Q and D conditions matrix pdf must add the current zoning and the current D conditions, making it possible to see the changes in any basic required way.

Accurate calculations and mapping must come first- then a Plan follows—not this way --by re-issuing the 2012 Plan:

- When this HPCU was first re-issued, the zoning matrix was more transparent, and the proposed Plan appeared to adhere quite closely to the Plan's zoning in the Plan rejected by Judge Goodman.
- Missing needed calculations must start with a date certain for statistics; from that date calculate genuine remaining Plan capacity from the 1988 Plan (for housing about 10, 800 units); add in a factor for expected growth inducement from TOCs and ADUs; map the 13,000 housing unit entitlements processed since 2012 in Hollywood that are in commercial zones, not residential; map projects Council awarded 2-5 times 1988 Plan zoning on particular parcels; calculate needed housing to meet SCAG etc population projections for 2040 (Linda Lou calculated 9,000 units @ 2 /DU); calculate remaining residential capacity and estimate housing capacity in commercial zones; conclude that at minimum twice the housing needed is already entitled or in remaining Plan capacity; and produce a plan to protect historic buildings and affordable housing in a meaningful way with no upzoning needed.

If growth with preservation, sustainability, and affordable housing is the goal, this new HPCU has not achieved it: The 1988 plan has adequate capacity for growth—even if only calculating the growth possible in residentially zoned areas. Obviously, in Hollywood the current growth with 13,000 residential units proposed/entitled/built to date, and maybe 6,000 completed, is largely in commercial zones.

- My calculation of capacity for the EIR was at minimum 330,000 people for the Community Plan Area under the existing 1988 Community Plan. With TOCs, ADUs, and 10 years of Council-approved discretionary actions, other experts have calculated it at over 600,000 persons.
- The current zoning was a confluence of the AB283 settlement, the exemption of Hollywood from Prop U, the widely recognized errors in the Regional Center land use category in the CRA area in central Hollywood, and the acquiescence to the Redevelopment Agency's desire to understate Plan capacity in the EIR, tying it to market projections.
- In other words the 1988 Community Plan capacity was much larger than calculated parcel by parcel even in 1988, and the discretionary actions to date have exceeded the Plan by a factor of at minimum 2, leaving the capacity still there.

Heritage Properties

- Commercial capacity of the 1988 Community Plan remaining at my last count was at 200% needed commercial square footage, according to jobs/housing balance formulas used in the past by the planning department
- Today's challenges of sustainability; preservation of our shared culture; dwindling water; crumbling infrastructure; and stagnant wages against rising land and construction prices require genuine innovative answers. The HPCU tries a few new tools, and tries in the CPIO to start a process to make Hollywood livable and affordable.
- Yesterdays challenges have not been addressed, and Hollywood is much the worse for it. Wholesale removal of D conditions removes important initiatives—a Hollywood Boulevard Urban Design Plan, a Transportation Plan—which were prepared in the 1990's and multiple times since and made to disappear.

#2 CORRECT MISLEADING PUBLIC ANNOUNCEMENTS, STAFF REPORTS, FLYERS

The continuing public announcements from City Planning are inaccurate and deceptive in three ways that I encourage you to immediately correct for the Planning Commission.

Correct statements that HPCU and CPIO includes “preservation” and “innovative strategies to promote preservation of historic resources” - stop telling the public it does, and take corrective action to make it true

Sadly, the HPCU Preservation Chapter has not been updated in accordance with written expert recommendations. The landmarks in the Community Plan are not mapped. The landmarks already listed at State and National (higher) status levels of significance than our local HCMs and HPOZs are given lower quality treatment and are targeted for demolition in the CPIO. The Plan text essentially repeats the activities the Office of Historic Resources already performs regulating projects involving HCMs and HPOZs.

I support Hollywood Heritage's proposals. Actions which would undo some of the damage of the CPIO as currently proposed are:

- Remove the Hollywood Boulevard upzoning, and remove the incentivization of demolition in the CPIO. Affordable housing—when ably calculated in the other incentive areas, will not suffer from this removal.
- Remove the California Register districts with the few remaining historic homes in central Hollywood from the CPIO incentivization scheme that targets entire neighborhoods for demolition. . Much of the work on “character residential” is good, if only demolition is prohibited and if the upzoning is removed; these areas are regulated; Preservation Brief 14 and the Niles Decision are followed; the Office of Historic Preservation has review authority.
- Treat “non-contributors” in historic districts as what they are: some are altered contributing buildings which would be protected in an HPOZ, and may be surprising gems if restored, and some aren't even that, but their design should be complementary as guided by Preservation Brief 314 and the Niles Decision.
- Discretionary reviews already in the Redevelopment Plan for 34 years to manage the refinements of historic building restorations should not be eliminated.

MetroRail stations in Hollywood may have been constructed after the 1988 Hollywood Community Plan, but they were planned for; no sea change is required to densify more near transit:

Heritage Properties

Metro locations in Hollywood were finalized and planned for years before the Community Plan was updated. Locations were all known to the planners and contracted to architects around 1983; modal shifts from bus to metro were built into the Hollywood traffic model; and all this was built clearly into the land use and zoning of the Hollywood Community Plan in 1988 and 1990 .

Had this Plan truly informed the public transparently, the Metro locations would jump off the page. The phrasing of the announcements feeds into the false narrative that the current Community Plan is “outdated.”

#3 CANCEL NEW FEB 5 ORDINANCE IN EXHIBIT I- it does NOT “clarify” the relationship to the Redevelopment Plan, it wipes it out.

This proposed ordinance is fully intent on repealing protections for historic buildings; requirements for design review; and planning obligations of the Redevelopment Plan to monitor traffic, resolve parking issues, etc. In direct violation of the promises made in the Negative Declaration at the time of the Transfer Ordinance, as well as multiple written and stated promises, this proposes to repeal/delete/eliminate the well wrought brakes on redevelopment which were put in place so that Hollywood had a chance to emerge as an attractive, livable, sustainable, equitable, place.

- Sec. 3. The following Sections of the Hollywood Redevelopment Plan are hereby deleted: 400, 401, 402, 402.1, 402.2, 402.3, 403, 403.1, 403.2, 404, 405, 405.1, 405.2, 406, 406.1, 406.2, 406.3, 407, 407.1, 407.1.1, 407.1.2, 407.1.3, 407.1.4, 407.2, 408, 409, 409.1, 409.2, 410, 410.1, 410.2, 410.3, 410.4, 410.5, 411, 412, 500, 501, 502, 503, 504, 505, 505.1, 505.2, 505.3, 505.4, 506, 506.1, 506.2, 506.2.1, 506.2.2, 506.2.3, 506.3, 506.4, 507, 507.1, 507.2, 507.3, 508, 508.1, 508.2, 508.3, 508.4, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 518.1, 518.2, 519, 520, 521, and 700.

This proposed Ordinance actively repeals more than 8 major initiatives which are touted in the Plan text Implementation section as desired for Hollywood, and needing to be “studied”. These are activities currently in the law that the Commission is being asked to vote to REPEAL. The proposed Ordinance actually repeals sections of the Redevelopment Plan that never transferred to the City!

There are extensive reasons why this new proposal is unthinkable.

#4 RESOLVE SIGNIFICANT PROBLEMS IN THE DEIR

EIR responses from Planning and the public are missing – the bedrock purpose of an EIR:

The public has been locked out of discussion with public comments—such as mine—unavailable to others. The purpose of CEQA is to bring the knowledge and concerns of the wider public into a “project” before it is fully cooked.

The Planning Commission is being denied the input of the public, which is the bedrock purpose of CEQA—to bring in all input at an early time to inform projects before they are developed.

This EIR was circulated prior to seemingly LARGE portions of the PLAN being revised, and documents for the Commission to approve never having been analyzed at all. Due to this rush after Feb. 5, some of these items may have been reviewed in the EIR, but I suspect no analysis is available to the public or the Planning Commission:

- i. Revised Draft Hollywood Land Use and Zone Change Matrix- REVISED February 2021—including Change of central Hollywood from C4 Zone to C2 and disappearance of prior zone recommendations purportedly evaluated in EIR

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- ii. Disappearance of prior zoning , prior D conditions--for changes in CPIO
- iii. Revised Plan Text February 2021
- iv. TOC and ADU: no quantification methodology shown for
- v. CPIO: Adding up to 100% upzoning “The Proposed Project was analyzed in the Draft EIR. As discussed above, some changes have been made to the Proposed Project since the Draft EIR was published. However, these changes do not result in new significant impacts. In some cases the changes reduce those impacts discussed in the Draft EIR, such as the addition of the proposed HCR District and the changes in the proposed CPIO District. As such, the changes do not result in significant new information requiring new impact analysis or recirculation.” This is just plain wrong.
- vi. TIA fees
- vii. Page 311- a note saying Environmental Standards may be developed
- viii. Exhibit F and E: Strange individual zone changes not on the map and unexplained—in the SNAP near Barnsdall and at Yamashiro (hidden in Plan footnote- not on map)
- ix. Exhibit I: Ordinance removing all land use obligations, restrictions, and historic protections in Community Redevelopment Area
- x. Exhibit G: Apply the HCR regulations to Outpost, the Oaks, Hollywoodland, Hollywood Knolls, Lake Hollywood, Curson and Nichols Canyon, but NOT applying it to neighborhoods where it is really needed- with no public discussion or input. with no public hearings and no focus on the distinct issues of these communities and their streets- linked to an outdated ZI No. 2467 and Ordinance 184827 Compared to the City’s process for haul routes ..
- xi. “Amend” the Vermont /Western Transit Oriented Specific Plan

For all the work on the Hollywood Community Plan, it appears to be working at cross purposes to itself. Reports are coming in from another Community Plan area that some of the template ideas behind this Community Plan just aren’t working. This is a Blueprint for Loss, which might be turned into a gem.

Respectfully submitted,
HERITAGE PROPERTIES



Frances Offenhauser



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February 14, 2021

City Planning Commissioners
Mr Craig Weber and Ms. Linda Lou,
Email: linda.lou@lacity.org
Email: cpc@lacity.org

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

Dear Commissioners:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

TAKEAWAY #3: *Save Hollywood Boulevard*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Richard Adkins
President

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

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

ATTACHMENT #4

HOLLYWOOD HERITAGE **Definition/Review of Historic Resources** **within Hollywood Redevelopment Area** **Summary of Peer Review required from Hollywood Heritage** (Detailed excel spread sheets and GIS format maps available)

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

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

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

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

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

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

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

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

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

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

Total number of properties: 913

Total number of current non-contributors within districts: 261

Action items/recommendations re “non-contributors”:

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

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

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

Public Information and the proposed 511 List

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

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

Benjamin M. Reznik
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www.jmbm.com

Ref: 80182-0001

February 12, 2021

BY EMAIL

President Millman, and Honorable Members
of the City Planning Commission
Department of City Planning
City of Los Angeles
200 N Spring St.
Los Angeles, CA 90012
E-Mail: CPC@lacity.org

Re: Department of City Planning Practice Restricting Residential Floor Area
for TOC Projects Located in CPIOs
Hearing Date: February 18, 2021
Agenda Item 3. General Public Comment

Dear Pres. Millman and Hon. Members of the City Planning Commission:

We submit this letter on behalf of our client 1218 West Manchester Associates LLC, owner of 1218 Manchester Avenue, an unimproved commercial property located walking distance from the Metro Silver-Line and several other transit lines. Pursuant to the City's Transit Oriented Communities ("TOC") program, our client seeks to develop the site with a Tier 2 TOC development with 132 residential units with 12 dedicated affordable units for Extremely Low Income tenants. The proposed development is permitted under the site's C-2 zoning as well as the South Los Angeles CPIO, which allows the proposed use and does not specify any restrictions on density or residential Floor Area Ratio ("FAR"). In processing the project's TOC referral form, we have been made aware of a Department of City Planning ("Department") practice which acts to undermine the TOC Guidelines by arbitrarily reducing the permitted residential floor area for TOC projects located CPIO's, citywide, and we wanted to bring this practice to the Commission's attention.

Specifically, the TOC guidelines provide that a Tier 2 project qualifies for a 45% FAR increase, "or an FAR increase resulting in at least 3.25:1 FAR in commercial zones, *whichever is greater.*" (TOC Guidelines § VI.1.b.ii, **Exhibit A.**) As our client's project is in a commercial zone, it is our understanding that, per the TOC Guidelines, the project would benefit from the 3:25:1 FAR incentive provided by this section in lieu of the 1.5:1 FAR provided by code for commercial zones. The Department, however, has another view. Based solely on the fact that

President Millman, and Honorable Members of
the City Planning Commission
February 12, 2021
Page 2

the property is located within a CPIO, the Department is applying an exception in Section VI.1.b.v.3 of the TOC guidelines to restrict residential FAR. This exception states that for projects located "[i]n the RD Zone or a Specific Plan or overlay district *that regulates residential FAR*, the maximum FAR increase shall be limited to 45%." (TOC Guidelines § VI.1.b.v.3.) (emphasis added) In applying this exception, the Department has read out the requirement that the overlay actually *regulate residential FAR* to be applicable, and instead applies the exception to all projects located within a CPIO, whether or not the CPIO actual regulates residential FAR. With respect to our client's project, instead of being permitted an FAR of 3.25:1 as would be provided anywhere else in the City, it is the Department's view that the development is limited by this exception to an FAR of 1.5:1 per code with the 45% increase, i.e. 2.175:1, simply because the site is located within a CPIO. This substantial reduction in residential FAR makes our client's project economically infeasible, and is contrary to every stated housing goal and policy set forth in state and local laws.

Through this practice, the Department is restricting an applicant's use of the TOC regulations in ways the Commission and the City Council never authorized or contemplated. It also operates to make TOC projects in CPIO's less desirable to build, and will result in smaller units with less community amenities. Accordingly, we respectfully request that the Commission review this practice and provide guidance to the Department and to the community at large, in order to avoid further confusion and loss of housing units. Thank you for your consideration and assistance.

Very truly yours,



BENJAMIN M. REZNIK and
DANIEL F. FREEDMAN of
Jeffer Mangels Butler & Mitchell LLP

cc: Terry Kaufmann-Macias, Esq. Land Use Division, Supervising Attorney
Vincent P. Bertoni, AICP, Director of Planning, Department of City Planning
Kevin J. Keller, AICP, Executive Officer, Department of City Planning
Lisa Webber, AICP, Deputy Director of Planning, Department of City Planning
Shana Bonstin, Deputy Director of Community Planning, Department of City Planning
Gerald Gubatan, Senior Planning Director, CD 1
Adrienne Asadoorian, Planning Deputy, CD 2
Elizabeth Ene, Director of Planning and Land Use, CD 3
Meg Healy, Planning Manager, CD 4

President Millman, and Honorable Members of
the City Planning Commission
February 12, 2021
Page 3

Daniel Skolnick, Senior Planning Deputy, CD 5
Max Podemski, Planning Director, CD 6
Paola Bassignana, Director of Planning and Economic Development, CD 7
Kristen Gordon, Planning and Economic Development Deputy, CD 8
Sherilyn Correa, Director of Planning and Economic Development, CD 9
Karly Kotana, Chief of Staff, CD 10
Len Nguyen, Senior Planning Deputy, CD 11
Hannah Lee, Chief of Staff, CD 12
Craig Bullock, Planning Director, CD 13
Emma Howard, Senior Planner, CD 14
Aksel Palacios, Planning Deputy, CD 15

1. Tier 1 – 35%
 2. Tier 2 – 35%
 3. Tier 3 – 40%
 4. Tier 4 – 45%
- b. **Floor Area Ratio (FAR).** In each Tier, the maximum increase in the allowable FAR permitted shall be equal to the following, provided that any additional floor area provided through this section is utilized only by residential uses:
- i. Tier 1 – Percentage increase of up to 40%, or an FAR increase resulting in at least a 2.75:1 FAR in commercial zones, whichever is greater.
 - ii. Tier 2 – Percentage increase of up to 45%, or an FAR increase resulting in at least a 3.25:1 FAR in commercial zones, whichever is greater.
 - iii. Tier 3 – Percentage increase of up to 50%, or an FAR increase resulting in at least a 3.75:1 FAR in commercial zones, whichever is greater.
 - iv. Tier 4 – Percentage increase of up to 55%, or an FAR increase resulting in at least a 4.25:1 FAR in commercial zones, whichever is greater.
 - v. **Exceptions**
 1. In the RD Zone or a Specific Plan or overlay district that regulates residential FAR, the maximum FAR increase shall be limited to 45%.
 2. If the allowable base FAR is less than 1.25:1 then the maximum FAR allowed per this section is limited to 2.75:1.
 3. In the Greater Downtown Housing Incentive Area, the maximum FAR increase shall be limited to 40%, with the total floor area of a residential building or residential portion of a building being calculated per the definition in LAMC 12.22 A.29(c)(1).

Note: For the purpose of applying this incentive, commercial zones include Hybrid Industrial zones, Commercial Manufacturing zones and any defined area in a Specific Plan or overlay district that allows for both commercial uses and residential uses.

2. **Automobile Parking.**

- a. **Residential Minimum Parking Requirements.**
- i. Tiers 1-3 - Required automobile parking for all residential units in an Eligible Housing Development (not just the restricted affordable units), inclusive of disabled and required guest parking, where applicable, shall be as follows:
 1. For an Eligible Housing Development, required parking for all residential units shall not exceed 0.5 spaces per bedroom.
 2. For an Eligible Housing Development that consists of 100% On-Site Restricted Affordable units, exclusive of a manager's unit or



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*Past President

February 15, 2021

Community Planning Bureau
Department of City Planning
City Hall, Room 667
200 N. Spring Street
Los Angeles, CA 90012

Dear Members of the Hollywood Community Plan Update Unit:

Comments on the Draft Hollywood Community Plan Update text, map, Environmental Impact EIR (DEIR), Zoning Ordinance, and Community Plan Implementation Ordinance (CPIO).

City Plan Case: CPC-2016-1450-CPU

Environmental Case: 2016-1351-EIR

1. Comments on policies and programs in the draft Hollywood Community Plan Update for the Los Feliz neighborhoods. (Presented orally by David L. Bell, Esq., Los Feliz Improvement Association Board Member)

Page 5-6 of the Community Plan Text, Chapter 5, contains a section on Historical Preservation Overlay Zones (HPOZs). It lists the six existing HPOZs in the Hollywood Community Plan area, and it indicates that a Melrose Hill Expansion Area is under study. This section should be amended to indicate that the Los Feliz Improvement Association has paid for and submitted an 18-volume historical survey of the Los Feliz area to the Department of City Planning's Office of Historic Resource and requested that the surveyed area be appropriately funded and designated as a large HPOZ or several smaller HPOZs. The LFIA submitted these architectural surveys to the Office of Historic Resources as a hard copy in 1996, and in electronic form in 2009, 2011, 2013, 2016, and 2018-19 as the area the survey covered was expanded.



Page 7-2 of the Community Plan Text, Chapter 7: Implementation contains Policy 29. "Develop a historic preservation district or districts in Los Feliz with community involvement and support." Policy 29 should be amended to indicate that the LFIA has prepared an 18-volume historical survey of contributing structures in Los Feliz, and the Association has submitted its survey to the Department of City Planning's Office of Historic Resources to fund and initiate the HPOZ preparation and adoption process.

Los Feliz Boulevard and Hillhurst Boulevard are listed for small zone changes in areas 13, 73, 77, 78, 79, 80. In addition, the LFIA requests that in the Los Feliz Village area, along Hillhurst and Vermont, from Los Feliz Boulevard to Prospect, RD 1.5 lots abutting commercial lots, be returned to their original R2 status. The purpose of these zone changes is to prevent displacement if or when the parcels are converted to quasi-Small Lot Subdivisions, per adopted Ordinance 185462 (LAMC 12.09.A.3).

The rationale for these zone changes was detailed in the attached letter to Councilmember David Ryu, on September 25, 2019:

1. *The R2 zone was named the "two family" zone because of its original intention was to house two families on one parcel.*
2. *When the LAMC was updated in January 2005, it added Section 12.09.A.3.b., which allows R2 corner lots to be re-zoned RD 1.5. This provision was inconsistent with the purpose of the R2 zone, and it has led to the expansion of the zone to include non-two-family uses.*
3. *The City's two Density Bonus ordinances, TOC Guidelines and SB 1818, allow developers to undercut the original intention of the of the R2 zone, which then severely taxes infrastructure and impacts the quality of life of those who live in or near these R2 zones.*
4. *The Update of the Hollywood Community Plan should use its Zone Change amendments to the remove LAMC 12.09.A.3.b. in entirety or exclude its application in the Los Feliz neighborhoods.*

2. Comments of the Draft Hollywood Community Plan Update

After two decades of continuous LA City Planning efforts to update the 1988 Hollywood Community Plan, Superior Court Judge Allan J. Goodman [overturned the 2012 Update](#) of the Hollywood Community Plan for being "*fundamentally and fatally flawed.*" Judge Goodman offered three [reasons for his decision](#):



- The 2012 Update was based on outdated demographic data.
- The 2012 Update failed to consider the need to expand municipal services and infrastructure for additional buildings and people.
- The 2012 Draft Environmental Impact Report did not accurately consider the Draft Community Plan's environmental impacts.

His decision further indicated that in the absence of a valid Updated Community Plan text, map, Draft Environmental Impact Report, and implementing ordinances, the 1988 plan and its attachments would remain binding until Hollywood Community Plan was correctly updated and adopted.

When the City Council adopted the 2012 Hollywood Community Plan Update, extensive public testimony identified [four other methodological flaws](#), all of which apply to the new 2020 Update of the Hollywood Community Plan, under consideration at the December 9, 2020, workshop and public hearing.

1. The 2012 Update, like the 2020 Update, was improperly sequenced. The previous and current Update should have followed, not preceded, the update of the General Plan's mandatory and optional [citywide elements](#), including Air Quality, Conservation, Health, Public Safety, Mobility, Infrastructure Systems, Open Space, Public Facilities and Services, Noise, and Housing. At present most of these General Plan elements are out-of-date, with no schedule published for their updating, except for the Housing Element.
2. The 2020 Update, like the previous 2012 Update, conflicted with the City Council-adopted 1996 General Plan Framework Element, a growth-neutral, not a growth-inducing General Plan element. Both Community Plan Updates had/have extensive up-zoning ordinance appended, and they are therefore growth inducing, in conflict with General Plan Framework Element.
3. The 2020 draft update, like the previous 2012 Update, has also failed to calculate the potential build out of existing zoning, instead implying without supportive evidence, that current zoning was not sufficient to meet the needs of Hollywood's future population.
4. The 2012 Update, like the 2020 Update, did not include a monitoring unit and work program to verify the Update's demographic assumptions, whether its implementing



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Page 4 of 9

programs were in effect and met the Plan's goals, and whether the remaining capacity of public infrastructure and public services was sufficient to meet forecast user demand.

To begin the Hollywood Community Plan Update adoption process, the Los Angeles Department of City Planning will host a [public meeting and hearing](#) to obtain comments on its draft Hollywood Community Plan documents. The December 9, 2020, hearing will consider public testimony regarding the new Community Plan text and map, appended zoning ordinances and Community Plan Implementation Ordinance (CPIO), Draft Environmental Impact Report (DEIR), and a partially recirculated Draft Environmental Impact Report.

The open question is whether the Department of City Planning has accurately responded to Judge Allan J. Goodman's stunning rebuke of its previous 2012 Hollywood Community Plan. Based on the LFIA's review of the new 2020 Update, the answer is that the current draft Update repeats many of the same mistakes that jeopardized the 2012 Update. More specifically:

Outdated demographic data. In 2021 the new Hollywood Community Plan Update will go before the City Planning Commission and the City Council, 11 years after the Bureau of the Census collected its 2010 baseline census data. In 2016 the Census Bureau extrapolated its 2010 data, which the Department of City Planning augmented with forecasts from the California State Department of Finance and the Southern California Association of Governments (SCAG). Most tellingly, City Planning's 2040 population forecast exceeds SCAG's rosy 2040 forecast by 17,000 to 48,000 people. This growth forecast, without a sound justification, is labelled "Reasonable Expected Development" even though [LA's population, like Hollywood's](#), is declining. The trend of population decline began before the Covid-19 Pandemic, which accelerated out-migration from Los Angeles. When or if this trend of population loss will reverse, is pure conjecture, including City Planning's population forecasts for the Community Plan horizon year of 2040.

Inadequate municipal services and infrastructure. The new Draft Environmental Impact Report indicates there will not be any upgrades to Hollywood's infrastructure, including upgraded water supply and electric power. The Update's rationale is that new development will be located in areas of Hollywood that have spare infrastructure and service capacity. As for any data or monitoring program substantiating this bold claim, the LFIA could not find them. Furthermore, the area for the proposed Community Plan Implementation Ordinance



(CPIO) is so vast, including the entire business district west of the Hollywood Freeway, plus the commercial corridors on LaCienega Boulevard, Melrose Avenue, Fairfax Avenue, LaBrea Avenue, Santa Monica Boulevard, Sunset Boulevard, Vine Street, and Western Avenue, that is not conceivable that existing infrastructure and public services can meet the needs of the additional people and buildings that the CPIO is likely to promote in these areas.

Ignored Environmental impacts. Every major project, like the updated Hollywood Community Plan, has serious environmental impacts, such as Green House Gas emissions, that cannot be eliminated. Instead, they can only be successfully mitigated by fundamentally redesigning the project, which the DEIR calls an *Environmentally Superior Alternative*. In this case, the DEIR labels this option the *Reduced Transit Oriented Development and Corridors Alternative*. Since the Hollywood Community Plan Update alternative that City Hall decision makers will consider for adoption rejects this alternative, the Update's Draft, Final, and Recirculated Environmental Impact Reports will require a [Statement of Overriding Considerations](#). This Statement does not yet appear to exist, but based on previous EIR's, it will claim, without current or future verification, that the updated Community Plan will generate so many additional jobs, low-income housing units, and/or transit trips that decision makers can safely ignore its adverse environmental impacts.

The LFIA believes that the Statement of Overriding Considerations to justify the Update's unmitigable adverse environmental impacts precede the adoption process, so those closely following and impacted by the plan can know, in advance, its contents. This information should also include a monitoring process to confirm that any forecast low-income housing units, jobs, or transit trips appear, and that if they do not, the Certification of the project will be withdrawn.

Furthermore, the project description in the DEIR is missing critical information. It indicates that the Update will require the following ordinances, none of which exist, and all of which would have environmental impacts. The LFIA believes this information must be provided to the public prior to the adoption process, in particular amendments to the Vermont/Western Transit Oriented District Specific Plan (SNAP)

1. General Plan amendments.
2. Amendments to the Vermont/Western Transit Oriented District Specific Plan (SNAP).
3. Amendments for the enhanced networks map in the Mobility Plan 2035.
4. Amendments to the General Plan Framework Element and other citywide elements of the General Plan. (This appears to overlap with #1.)



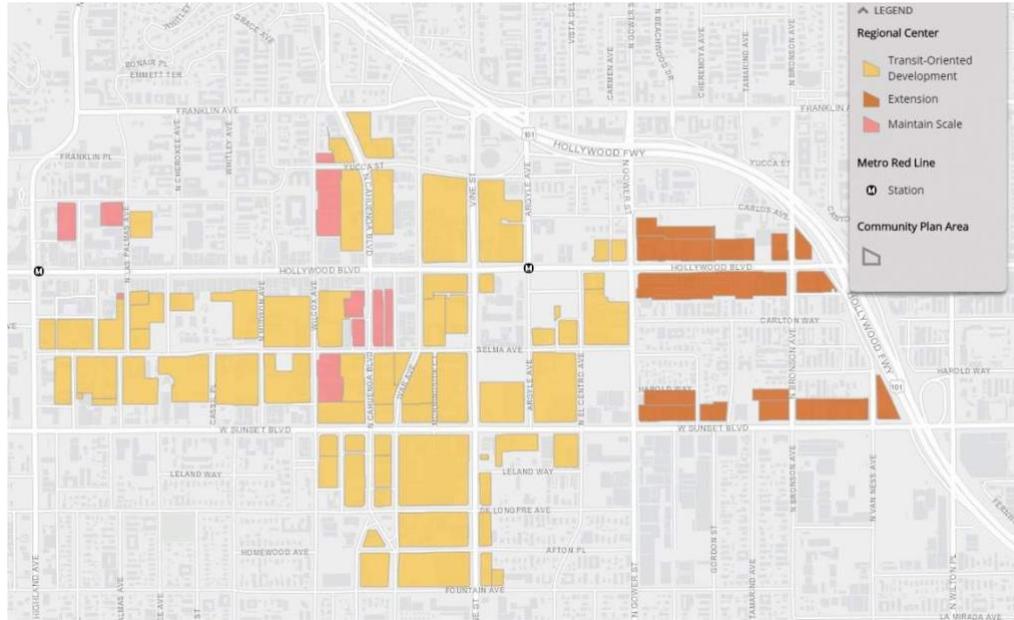
5. Amendments to all other relevant ordinances and actions, as necessary to ensure consistency of regulations and implementation of the Community Plan amendments.
6. Hillside Construction Regulation Supplemental Use District (Listed in public notice, not DEIR)

Improper sequencing. Like the 2012 plan that Judge Allan J. Goodman rejected, the current 2020 Hollywood draft Hollywood Community Plan Update also precedes the update of the General Plan’s citywide elements, most of which are out-of-date. It makes frequent references to the 24-year-old [General Plan Framework Element](#), while other relevant General Plan elements, particularly [Infrastructure Systems](#) and [Public Facilities and Services](#), are 50 years old. City Hall should thoroughly update all of these General Plan elements before updating a local Community Plan that the Superior Court rejected because of old demographic data and inadequate infrastructure and public services.

Conflicts with the General Plan. The current Hollywood Community Plan Update repeatedly claims that it consistent with the existing General Plan, especially the 1996 General Plan Framework Element. But this is not the case because the Framework Element is clearly growth neutral. It is not growth-inducing, like the draft Hollywood Community Plan. The Framework, in contrast, presented two criteria for plan implementation ordinances that increased planned and zoned density and intensity.

First, the implementation ordinances so far shared with the public need to demonstrate that existing plan designations and zoning could **not** meet the housing needs of future Hollywood residents. As far as we could determine, neither the Updated Hollywood Plan nor its DEIR contained this information.

Second, based on the [Framework Element’s Objective 3.3](#): (“Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.”), the proposed implementation ordinance(s) must also present clear evidence that LA’s public infrastructure and services can meet the needs of additional people and building. While the Hollywood Community Plan Update makes these claims, we could not find any data in the plan documents to substantiate these claims. Without these data, they remain unsupported assertions.



Proposed Update will increase density in Hollywood core.

Conflicts with zoning build out. The Update implies that Hollywood’s existing zoning is inadequate to meet forecast demand for housing, and therefore the Update’s implementation ordinances present an extensive program of [up-zoning](#). But Hollywood has plenty of underutilized zoning, mostly commercial lots on transit corridors that are suitable for by-right apartment buildings. In fact, Hollywood’s [existing zoning](#), as presented on page 3-8 of the Draft Hollywood Community Plan Update, allows its population to double, reaching 470,000 people. This is 264,000 more people than SCAG’s 2040 population forecast, repeatedly cited in the Update. If Accessory Dwelling Units and Density Bonuses are then factored in, Hollywood’s population could reach 630,000 people. This is 426,000 more people than SCAG’s 2040 forecast or 2040, and 366,000 more people than City Planning’s 2040 *Reasonable Expected Development* population forecast.



**Hollywood Community
Plan Demographics**

<u>Zone</u>	<u>DUA (standard densities)</u>	<u>Acres of zoning</u>	<u>Units capacity (formula)</u>	<u>Persons/ Unit (standard input)</u>	<u>Persons Capacity (before bonus)</u>	<u>Add ADU and Density Bonus</u>	<u>Persons Capacity after ADU and TOC bonus</u>
Minimal RE40	1.1	617	672	2.64	1,774	25%	2,217
Very Low II RE15	2.9	1459	4,237	1.89	8,008	25%	10,010
Low I RE9	4.8	353	1,709	1.89	3,229	25%	4,036
Low II R1	8.7	1941	16,910	1.89	31,960	25%	39,950
Low Medium I R2	35.0	1941	67,935	1.89	128,397	35%	173,336
Low Medium II RD1.5	29.0	798	23,174	1.89	43,799	35%	59,128
Medium R3	54.5	786	42,798	1.85	79,176	35%	106,887
High Medium R4	108.9	154	16,771	1.85	31,026	35%	41,885
High R5	217.8	77	16,771	1.87	31,361	35%	42,337
Commercial	70.0	851	59,570	1.87	111,396	35%	150,384
Total							
	Number of people				470,125		630,171

* No M zones included, three of which permit by-right apartments.

* 50% of R1 zones may not fit ADU

Clearly, Hollywood does not have a shortage of existing parcels available for all population growth scenarios. There is no reason for the Update to include a [96 page up-zoning ordinance](#) and a companion 95 page [Community Plan Implementation Ordinance](#) for even more up-zoning. In light of Hollywood’s existing and unused zoning capacity, at best new layers of zoning capacity will remain unused. At worst, they will increase the value of existing parcels and promote flipping by property owners. If the up-zoning ordinance do, however, result in larger buildings, the recent building boom in Hollywood indicates these buildings will contain expensive apartments occupied by tenants who own and use personal cars or Ubers for mobility. Since the decline in mass transit ridership in Hollywood has accompanied an increase in these Transit Oriented Development apartments, to build more expensive apartments will lead to more of the same results:



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Page 9 of 9

- Declining transit ridership.
- Eviction of long-term tenants.
- Demolition of buildings subject to the City's Rent Stabilization Ordinance.
- Increased traffic and related Green House Gas emissions.

One potential remedy to this situation should be added to the Hollywood Community Plan. The percentage of required low-income units in new residential projects should be raised to 25 percent. It must also be accompanied by an enforcement program that verifies the existence of promised low-income units and that they are rented to certified low-income tenants.

Failure to monitor the Update. The General Plan Framework, so frequently referenced in the current Update, requires City Planning to establish a General Plan Monitoring Unit. Once established, this unit would prepare and distribute annual General Plan monitoring reports. Without these reports, there is no way to determine if the Update's 146 implementation programs actually exist or if they successfully meet the Update's multiple planning goals. Furthermore, the Update is based on assumptions about forecast increases in population, housing, employment. Without monitoring, it is impossible to know if these demographic assumptions are correct, or if they should be adjusted upward or downward, along with the Update's closely related implementation programs.

In 2013, when Judge Allan J. Goodman ruled that the adopted Hollywood Community Plan was fatally flawed, he exposed a misuse of Community Plans as a land use scheme to increase the value of older commercial real estate through up-zoning. The current revision of the Hollywood Community Plan appears to be driven by the same agenda and it, therefore, does not pass the criteria presented in the 2010 judicial rejection of the previous Hollywood Community Plan Update.

Sincerely,
Amy Gustincic

A handwritten signature in black ink that reads "Amy Gustincic". The signature is fluid and cursive, written in a professional style.

President, LFIA

Attachment: LFIA letter dated September 25, 2019



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2019-2020

September 25, 2019

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*Past President

The Honorable David Ryu
Los Angeles City Hall
200 N. Spring St., Room 425
Los Angeles, CA 90012

Dear Councilmember Ryu,

The Los Feliz Improvement Association (LFIA) was pleased to see that on September 10, 2019 you voted YES on Council File 19-0939, supporting an Interim Control Ordinance (ICO) to prohibit the issuance of demolition, building, grading and other applicable permits in C2 zones, where the property is located immediately adjacent to an R1 or more restrictive zone and fronts a local street.

We recognize that by voting YES in this instance you chose to protect the integrity of a restrictive residential zone until the city plans could be updated. We would like to point out another inconsistency in the current municipal code which has resulted in the degradation of the R2 zone. This is Provision 12.09A3 (b) which allows corner lots in R2 zones to be re-zoned RD 1.5. This Provision was always inconsistent with the purpose of the R2 zone which is called the "two family" zone. However, when it was adopted in January of 2005, there were no density bonuses and no TOC. Today this Provision allows for extreme density in what is supposed to be a restrictive zone with no upgrades to infrastructure. Therefore, this provision threatens to destroy the very purpose of R2 zones and severely impact the quality of life for those who live there.

Witnessing your protections support in neighboring council districts and the "Neighborhood First" platform on which you ran for office, we believe rectifying the above described inconsistency is consistent with your principles. We have drafted an initial motion for your reference to assist you and your staff in expediting the process. We look forward to your support with this issue and please do not hesitate to reach out to the LFIA for further support.

Sincerely,

Amy Gustincic
President

Cc: Nicholas Greif
Justin Orenstein
Emma Howard

MOTION

WHEREAS the Los Angeles Municipal Code allows for several restrictive zones including the R2 zones.

AND WHEREAS The R2 zone was named the “two family” zone in accordance with the intention of the zone.

AND WHEREAS When the Code was updated in January 2005, to include Provision 12.09A3 (b) which allows corner lots in R2 zones to be re-zoned RD 1.5, the Provision was always inconsistent with the purpose of the R2 zone and led to the degradation of the zone.

AND WHEREAS The TOC and density bonuses currently allow developers to take advantage of this inconsistency in the code, completely destroying the intention of the R2 zone, severely taxing the infrastructure, and impacting the quality of life for those who live in R2 zones.

I THEREFORE MOVE that the Council instruct the Department of City Planning, in consultation with the City Attorney remove Provision 12.09A3 (b) from the Los Angeles Municipal Code in the Recode LA process.

I THEREFORE MOVE that the Council instruct the Department of City Planning, in consultation with the City Attorney, to prepare and present an Interim Control Ordinance (ICO), to prohibit the issuance of demolition, building, grading, and other applicable permits in R2 zones, where the property is located immediately adjacent to a commercial lot.

I FURTHER MOVE that the ICO include an Urgency Clause making it effective upon publication, and consistent with California Government Code Section 65858, the ICO run for 45 days, with a 10 month and 15 days extension by Council Resolution, and can be further extended for an additional year, or until the adoption of the appropriate in the municipal code.



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December 29th, 2020

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Los Angeles City Hall
200 North Spring Street, Room 667
Los Angeles, CA 90012

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**Subject: Hollywood Community Plan Update – CPIO
Mid City West Community Council Comments**

Cindy Bitterman

Shem Bitterman

Lauren Borchard

Montrese Chandler

Lindsey Chase

Michelle Einstein

Isack Fadlon

Barbara Gallen

Adam Gerber

Marisa Glucoft

Will Hackner

Lynda La Rose

Taylor Holland

Tyler Lambert-Perkins

We appreciate the opportunity to comment on the Hollywood Community Plan Update, and specifically the Community Plan Implementation Overlay (CPIO)

The Mid City West Community Council (MCW) Board of Directors **approved** the following motion (25 yeas, 3 nays, 0 abstentions) at the Tuesday, December 8th, 2020 board meeting:

Mid City West Community Council submits the following letter to the Los Angeles City Planning Department:

Mid City West Community Council submits the following comments about the Hollywood Community Plan Update and the CPIO.

Charles Lindenblatt

David Mann

Jenny Morataya

Terence Mylonas

Taylor Nichols

Abe Rakov

Arnali Ray

Michael Schneider

David Sobel

Thao Tran

Don Whitehead

Roque Wicker

1. Why is there no mansionization protection built in to the Hollywood Community Area Plan Update for multifamily zones?;
2. Should incentives for 100% affordable developments be more generous, or relatedly, should there just be no restrictions on 100% affordable developments to make them as easy to pencil as possible?;

3. Why is the CPIO the only place for changes in the community planning area?;
4. Storefront design restrictions seem overly burdensome and stringent.
5. Affordable percentages for incentive purposes should be higher than currently presented
6. Parking Minimums should be eliminated for all new housing projects in the CPIO that are seeking incentives in exchange for provision of below market rate housing.

Thank you for your consideration.

Thank you for your attention to this matter. Please feel free to contact us via email at sepstein@midcitywest.org, or mberker@midcitywest.org needed.

Sincerely,

Scott Epstein
Chair
Mid City West Community Council

Cc:	Priya Mehendale, City Planning Dept.	via email
	Councilmember Hon. Paul Koretz	“
	Councilmember Hon. Nithya Raman	“
	Office of Council District No. 5, Daniel Skolnick	“
	Office of Council District No. 5, Jeff Ebenstein	“
	Office of Council District No. 4, Jessica Salans	“
	Office of Council District No. 4, Tabatha Yelos	“



*A California Public
Benefit Corporation
To Preserve the Natural
Resources of the
Santa Monica Mountains*

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3815 Old Topanga Canyon Road
Calabasas, CA 91302
Tel: (818) 591-1701
Email: mrt@mountainstrust.org
www.mountainstrust.org

VIA EMAIL ONLY

February 11, 2021

Los Angeles City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

**Re: Comments on the Hollywood Community Plan Update, City EIR No.
ENV-2016-1451-EIR, CPC-2016-1450-CPU, State Clearinghouse No.
2016041093**

Dear Hearing Officer:

Mountains Restoration Trust (MRT) is a non-profit, public benefit land trust committed to preserving the cultural and natural resources of the Santa Monica Mountains. I write to support the Hollywood Community Plan Update's Policy PR3.1 Preserve Open Space, which aims to: *"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"*.

To further the goals of this policy, MRT recommends that the City re-zone to "Open Space" all land currently owned by Laurel Canyon Land Trust, the Mountains Recreation and Conservation Authority, and the Santa Monica Mountains Conservancy. In doing so, the City can add an additional layer of protection to these open space parcels and demonstrate a commitment to the admirable goal of increasing open space for the City's residents.

If you have any questions, please do not hesitate to call me at 818-591-1701, or by email at kgaston@mountainstrust.org.

Regards,

Kevin Gaston
Deputy Director

80+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

We need a Just Hollywood Plan including the following:

1. More public oversight over commercial development through a conditional use permit for hotels, appealable to Council.
2. No new upzoning, only bonuses for housing: Don't allow increased base zoning rights, which allow commercial development to crowd out housing. Instead, create bonus FAR for housing only.
3. Don't allow FAR bonuses to be used by hotel developers. Hotels should not be allowed in projects using CPIO Affordable Housing, open space, or other bonuses. Make clear that projects containing hotel uses are not exempt from Site Plan Review, even if they participate in the bonus program.
4. Make Hollywood Green: require native trees and shrubs in landscaping, energy efficient buildings, and mass transit incentives.

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



PRESIDENT
Charley Mims
CHAIRMAN
Marian Dodge
VICE PRESIDENT
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SECRETARY
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TREASURER
Don Andres

City Planning Commission
cpc@lacity.org

February 11, 2021

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Torreyson Flynn Assn.
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

Re: **#6 CPC-2016-1450-CPU Hollywood Community Plan**

Dear Commissioners:

The Hillside Federation, founded in 1952, represents 46 resident and homeowner associations spanning the Santa Monica Mountains. The Mission of the Federation is to encourage and promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles.

One of the most important issues in the Hollywood Community Plan is a technical matter. The Santa Monica Mountains Conservancy (SMMC) and the Mountains Recreation and Conservation Authority (MRCA) frequently purchase parcels of land as they become available to preserve as Open Space. First, please make sure that the Plan clearly states that the SMMC has first right of refusal when vacant parcels become available. Second, once a parcel is purchased by the SMMC or MRCA, the Plan needs to state that the zoning of the parcel, regardless of its zoning prior to the purchase, be changed on all official records to Open Space.

These are procedures that are supposed to be happening now; however the Federation wants to see them codified in the Hollywood Community Plan for clarity.

Thank you for your consideration.

Sincerely,

Charley Mims

CHAIRS EMERITI
Shirley Cohen
Jerome C. Daniel
Patricia Bell Hearst
Alan Kishbaugh
Steve Twining
CHAIRS IN MEMORIAM
Brian Moore
Gordon Murley
Polly Ward

THE SILVERSTEIN LAW FIRM

A Professional Corporation

215 NORTH MARENGO AVENUE, 3RD FLOOR
PASADENA, CALIFORNIA 91101-1504

PHONE: (626) 449-4200 FAX: (626) 449-4205

ROBERT@ROBERTSILVERSTEINLAW.COM
WWW.ROBERTSILVERSTEINLAW.COM

February 15, 2021

VIA EMAIL cpc@lacity.org;
hollywoodplan@lacity.org

President and Planning Commissioners
Los Angeles City Planning Commission
City of Los Angeles, Department of City Planning
221 North Figueroa Street
Los Angeles, CA 90012

Re: Comments and Objections to City Planning Commission for Item No. 6 for
February 18, 2021; CPC-2016-1450-CPU & ENV-2016-1451-EIR

Honorable Planning Commissioners:

This firm and the undersigned represent AIDS Healthcare Foundation. Please keep this office on the list of interested persons to receive timely notice of all hearings, votes and determinations related to the proposed ordinance concerning the Hollywood Redevelopment Plan (“Repeal Ordinance”), the Hollywood Community Plan Update (“HCPU”), and its EIR (collectively, “Project”).

We incorporate all comments, evidence and objections filed in this HCPU proceeding¹, including the Court documents and entire administrative record of the prior HCPU EIR litigation where the reviewing court concluded the City used a “fatally flawed” EIR to approve the HCPU. We included all of those prior proceedings to the current record as part of our February 8, 2021 submittal to the Commission, and we direct your attention to the Court’s ruling in assessing whether you have a legally compliant EIR before you today.² We contend you do not.

¹ We specifically request that all the hyperlinks in all comment letters be downloaded, printed out, considered by the City, and be included in the City’s official paper and/or electronic files, including its P and N shared drives, all as part of the administrative record.

² Of course, it is impossible for this Commission to determine if it has a legally compliant EIR before it because the City Planning Department staff has not issued the

Because the City has suddenly revealed an intent to adopt a Repeal Ordinance affecting the Hollywood Redevelopment Plan in connection with this new effort to adopt the HCPU, we also incorporate all objections and evidence in the City Planning Department's files for Case No. CPC-2018-6005-CA; ENV-2018-6006-CE & ENV-2019-4121-ND. The City's alleged power to adopt the Repeal Ordinance hinges upon, *inter alia*, the legality of the City's CRA Transfer Resolution and the associated amendments to the City's municipal code in the Fall of 2019 ("CRA Transfer Project").

The lawfulness of the CRA Transfer Project is currently in litigation, AIDS Healthcare Foundation v. City of Los Angeles (Sacramento Superior Court Case No. 34-2020-80003462-CU-WMGDS). Accordingly, if the Court determines the City violated CEQA and the Community Redevelopment Law, the purported transfer of CRA/LA redevelopment plans and land use functions to the City is void, and the City's effort now to adopt an ordinance substantively repealing the supposedly carried over Hollywood Redevelopment Plan is itself *void ab initio*.

I. THE HCPU DEIR IS FATALLY FLAWED FOR FAILURE TO PROVIDE AN ACCURATE, STABLE AND FINITE PROJECT DESCRIPTION, REPRESENTING THE WHOLE OF THE ACTION.

It is long held that where the agency purposely provides an *erroneous* or *speculative* project description, such conduct is not only a violation of CEQA but "insidious conduct" evidencing an intentional effort to mislead the public. Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 593 ("Authority used an erroneous or entirely speculative project description as justification for its acquisition of Hensler's property, but never intended to actually proceed with that project. If true, such a situation would constitute much more insidious conduct than a failure to comply with CEQA. (Cit. omit).") The record and the chronology of events in this case reflect insidious conduct to omit from the HCPU DEIR an accurate description of the whole project the City intended to carry out, including a now-revealed flawed proposal to effectively repeal all substantive regulations and legal obligations associated with the Hollywood Redevelopment Plan.

HCPU Final EIR so that this Commission can see the City's written responses to the public participation comments submitted in response to the Draft EIR. Presumably this Commission has not been provided a copy of any Final EIR that has not been released to the public, as that would also violate the Brown Act. See Section II *infra*.

The Prior Litigation Invalidated The HCPU And EIR.

The HCPU was invalidated in 2012 by the Los Angeles County Superior Court, including on grounds of failure to provide a reasonable range of alternatives and failure to focus on identifying and accommodating the reasonable *population* growth in the community plan area.³ The Court issued orders, attached to our previous correspondence dated February 8, 2021, directing the City to fully comply with CEQA and file a Final Return demonstrating compliance with the law.

The New HCPU Notice of Preparation Project Description Omitted Any Proposal To Amend Or Repeal The Hollywood Redevelopment Plan.

Thereafter, on April 29, 2016, the City issued its Notice of Preparation of a Draft EIR for the HCPU. In the Project description portion of the City's Notice of Preparation, the City did not describe the proposed project as including any amendment or repeal of the Hollywood Redevelopment Plan.

The City Had Failed To (Purport To) Transfer Redevelopment Plans And Land Use Functions Until the CRA/LA Refused To Approve Projects That Violated The Protective Limits Of the Redevelopment Plans

In 2012, after the Legislature dissolved former redevelopment agencies, the City refused to initially accept successor agency responsibilities of its former redevelopment agency. After the governor appointed the board of a successor agency that called itself "CRA/LA," that successor agency continued to administer about 30 redevelopment plans, including all of the land use approvals required under those plans. Thereafter, the City considered a transfer of redevelopment plans and land use functions, but refused to do so for some time because it did not want to assume all of the responsibilities associated with redevelopment plans.⁴

³ One of the reasons for invalidation was that the City ignored the 2010 Census numbers, and instead used older SCAG estimates known to be inflated and inaccurate.

⁴ A more complete summary of the history of the CRA Transfer Project is contained in AHF's Verified First Amended Petition for Writ of Mandate in AHF v. City of Los Angeles at ¶¶ 17-32. Given the Commission's onerous (and we believe illegal) document submission page limits, we have not attached a copy of this First Amended Petition, but the Commission is advised to request the City Attorney provide a copy for your review.

Multiple times when the City contemplated various resolutions to transfer CRA redevelopment plans and land use functions to itself, the City declared it was unwilling to assume portions of those plans and authorities. In part, the City did not want to assume responsibilities in redevelopment plans that were enforced against the former redevelopment agency pursuant to settlement agreements (the Wiggins and Hollywood Heritage settlement agreements).

In June of 2018, the CRA/LA issued a memorandum in response to the City's TOC Guidelines stating that TOC Guideline density changes do not supersede the density limits of the Redevelopment Plans. In response to this memo, it suddenly became a City priority to transfer the redevelopment plans and land use functions to the City. It was clear the City wanted to defeat the City's redevelopment plans that contain protective provisions the City no longer wanted to enforce, including for example, the Hollywood Redevelopment Plan provisions that protect the statutory beneficiaries of that Plan.

The City Releases The HCPU DEIR Project Description Omitting Its Intent To Amend Or Repeal The Hollywood Redevelopment Plan.

Meanwhile, in the HCPU process, the City in November 2018 circulated a HCPU Draft EIR for public comment. The Project Description for the HCPU did not include any proposal to amend or repeal any of the Hollywood Redevelopment Plan as part of the "project" or "project description" section – even though the City at that time was well aware of the CRA/LA's June 2018 memo refusing to approve TOC projects in certain redevelopment plan areas of the City.

However, although there was no disclosure to the public of a project description that included amendment or repeal of the Hollywood Redevelopment Plan, buried in the "Land Use Impacts" section of the HCPU DEIR were claims that the DEIR analyzed the impacts of greater development in the HCPU area *without* regulations and density limitations of the Hollywood Redevelopment Plan. This was a subterfuge because in both the Project Description and the Land Use sections, if the Project contemplated eliminating vital community controls over development to avoid or reduce environmental impacts, the whole of the proposed actions, including substantive repeal of the Hollywood Redevelopment Plan, was required to be disclosed and thoroughly analyzed.

Thus, while the 2018 HCPU DEIR's Land Use section and referenced Appendix M seemed to assume a repeal of the Hollywood Redevelopment Plan, the 2018 HCPU DEIR's project description failed to disclose any amendment to the Hollywood

Redevelopment Plan anywhere and especially in Section 3.10 at DEIR, p. 3-41, where it listed all “discretionary actions and approvals” in order to implement the Project.

Additionally, the land use section of the DEIR did not affirmatively state anything concerning *amendments* or *repeal* of the Hollywood Redevelopment Plan and did not explain how those amendments could be carried out since, at the time the DEIR was issued, the CRA/LA still possessed the sole authority to administer the redevelopment plans of the City under California’s Community Redevelopment Law. Thus, out of the starting gate, the City failed to comply with the requirements of CEQA.

Contradictory Statements Made In The CRA Transfer Environmental Documents

While the public comment period on the 2018 HCPU DEIR was underway (November 15, 2018 to January 31, 2019), City Planning staff came before this Commission on December 20, 2018 with a proposed resolution and municipal code amendments purporting to transfer **selected portions** of the City’s redevelopment plans and land use functions from the CRA/LA to the City. In support of this action, the City misleadingly informed the public and this Commission that it did not contemplate any change in density limits upon completion of the CRA/LA transfer. In fact the City staff issued a December 10, 2018 Notice of Exemption from CEQA as to the proposed CRA Transfer of plans and land use functions:

“This action does not change or amend any land use provisions of any of the existing unexpired Redevelopment Plans or adopted Designs for Developments or Design Guidelines (DFDs).”⁵

As further evidence of its December 2018 reassurance to *preserve* and *not change* the design standards (i.e., density caps and design criteria), the City invoked several CEQA exemptions for its purported transfer of CRA/LA land use plans under Guidelines §§ 15378(b)(5) [organization or administration of activities that will not result in direct or indirect impacts to the environment], 15308 [regulatory actions for the protection of the environment], and 15320 [local government reorganization requiring no changes].

When specifically confronted by public comments about the reasonably foreseeable impacts of the CRA/LA Transfer, in July 2019 the City prepared a Negative

⁵ See at http://clkrep.lacity.org/onlinedocs/2013/13-1482-S3_misc_2_12-21-2018.pdf

Declaration. In that document, over and over the City insisted that no amendments of the City's redevelopment plans were contemplated, imminent, foreseeable, or expected. These statements were contradicted by the City's 2018 HCPU DEIR Land Use section and Appendix M that asserted that the Hollywood Redevelopment Plan provisions and land use functions would be overridden or repealed within the HCPU process.

The City Recirculates Portion Of the DEIR And Still Fails To Disclose Its Intent To Amend Or Repeal The Hollywood Redevelopment Plan.

After the City's release of conflicting statements in the 2018 DEIR Land Use analysis for the HCPU, and the confusing simultaneous Notice of Exemption and Negative Declaration for the CRA/LA transfer project, the City in October 2019 released a Recirculated DEIR ("RecDEIR") for the HCPU. That 2019 RecDEIR for the HCPU did not mention anything about contemplated amendments to the Hollywood Redevelopment Plan, even though by September 2019, the month before, the City took action purporting to selectively transfer portions of the City's redevelopment plans to itself in the CRA Transfer Project. Thus, even in the RecDEIR, when it had the opportunity to lawfully disclose the entire project it fully contemplated, the City continued to fail to disclose and fully analyze its intent to amend or repeal the Hollywood Redevelopment Plan and remove the plan's protective provisions.

On The Eve Of Final Approval Hearings On The HCPU And Its EIR, The City Released A "Clarification" That It Proposes An Ordinance To Amend All Substantive Provisions Out Of The Hollywood Redevelopment Plan

Only with the release of email and mailed notices of the City Planning Commission's February 18, 2021 meeting three weeks ago was there a passing reference to some kind of "clarification" of the relationship of the HCPU to the Hollywood Redevelopment Plan. But even these notices failed to inform the public, including all of the owners, tenants, and business owners in the redevelopment plan area,⁶ that the

⁶ California redevelopment law and the redevelopment plans adopted under the authority of state statutes involve plan rights and protections that every property owner, tenant, or business owner relies upon. It requires clear notice of any changes to those rights, yet there is no evidence that the City's notice of the release of the 2018 DEIR or the 2019 RecEIR was mailed with actual notice to Hollywood Redevelopment Plan beneficiaries, even though obscured in the text of the HCPU DEIR were statements that the protections of the plan were to be removed by some undefined mechanism.

Redevelopment Plan was targeted for total substantive repeal. Because the City's draft ordinance only refers to sections of the Hollywood Redevelopment Plan by section numbers, unless the recipients have access to a copy of the Hollywood Redevelopment Plan, they still would not know that the purported "amendment" of the Plan was actually a removal of all substantive provisions, including provisions that in September 2019, the City expressly denied it was transferring to its jurisdiction and control.⁷

At no time during the entire HCPU process did the City ever clearly and unequivocally state that it intended to or desired to not only repeal certain land use provisions of the redevelopment plans, but all plan provisions to protect historic resources, EIR mitigation measures, and all other substantive provisions and settlement agreements. These omissions do violence to public participation rights under CEQA.

It is long settled:

"A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance. An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192-193.

The accurate project description is also required under Guidelines § 15378 subdivisions (a) and (c), which state that the project "means the whole of an action" and cautions that the term "project" refers to the activity which is being approved, rather than each separate governmental approval. By failing to disclose the elimination of the

⁷ The September 2019 Transfer Resolution adopted by the City Council purported to only transfer to the City the "500" section numbers of the Hollywood Redevelopment Plan. But if the Commission reviews the proposed ordinance before it, City Planners purport to delete all of the "400" section numbers and amend other provisions outside the "500" section numbers. The City has no authority to amend that which it did not legally transfer to itself in September 2019, if partial transfer is even lawful, which it is not.

Hollywood Redevelopment Plan density caps and all other protective regulations in the Project Description, the 2018 HCPU DEIR and the 2019 RecDEIR failed to provide the accurate description of the “whole of the project,” which was clearly known and intended by the City.

Further, by failing to disclose its intent all along to override all legal obligations linked to the Hollywood Redevelopment Plan, which is far more than simply the land use provisions, the City failed to provide a stable and finite bona fide project description, in violation of CEQA. See Guidelines § 15020 (“Lead Agency shall not knowingly release a deficient document hoping that public comments will correct defects in the document”). See also Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 592:

“‘An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.’ (McQueen v. Board of Directors, supra, 202 Cal.App.3d at p. 1143, 249 Cal.Rptr. 439.) A narrow view of a project could result in the fallacy of division, that is, overlooking its cumulative impact by separately focusing on isolated parts of the whole. (Id., at p. 1144, 249 Cal.Rptr. 439.)

“‘An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR; the defined project and not some different project must be the EIR’s bona fide subject. (Mira Monte Homeowners Assn. v. County of Ventura (1985) 165 Cal.App.3d 357, 365, 212 Cal.Rptr. 127.) ‘CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.’ (Id., at p. 366, 212 Cal.Rptr. 127, internal quotation marks omitted.)” Id.

Thus, not only the HCPU DEIR Project Description is flawed in violation of CEQA’s project description requirement – it was also *purposely* misleading, in violation of CEQA’s mandate to not knowingly circulate a defective document. See also Washoe Meadows Community v. Department of Parks & Recreation (2017) 17 Cal.App.5th 277,

288-289 (“[W]hen an EIR contains unstable or shifting descriptions of the project, meaningful public participation is stultified.” (San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 656, 57 Cal.Rptr.3d 663 [project description in DEIR regarding mine expansion was unstable and misleading because it suggested both that no increase in mine production was sought and that mine production would substantially increase if project was approved].)”).

In the words of County of Inyo v. City of Los Angeles, *supra*, 71 Cal.App.3d at 199-200:

“We reiterate—an accurate, stable and finite project description is the sine qua non of an information and legally sufficient EIR. The defined project and not some different project must be the EIR’s bona fide subject. The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal. (Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 284—285, 118 Cal.Rptr. 249, 529 P.2d 1017.) Here, in contrast, the **interrelated character** of the **proposals** was **known in advance**. Here, the selection of a **narrow project** as the **launching pad for a vastly wider proposal frustrated CEQA’s public information aims**. The Department’s **calculated selection** of its truncated project concept was not an abstract violation of CEQA. In formulating the EIR, the Department of Water and Power did not proceed ‘in a manner required by law.’ (§ 21168.5.)” *Id.* (emph. added.)

The City’s failure to provide an accurate project description tainted the entire HCPU DEIR, including identification and mitigation of individual and cumulative impacts of the project, baseline, as well as identification of proper alternatives and feasible mitigation. Under Guidelines § 15088.5(a), the HCPU DEIR must be recirculated to provide a complete and accurate project description, the correct baseline from that project description must be provided, environmental impacts must anew be disclosed, analyzed and mitigated based upon those corrected parameters, and notification to the public and of a restarted public comment period on a revised Draft EIR on the complete project description must include actual notice to owners, tenants, and business owners within the Redevelopment Plan area affected by the proposed changes.

None of this has happened to date, and accordingly the City has failed to proceed in the manner required by law.

II. THE CITY'S FAILURE TO RELEASE THE FINAL EIR FRUSTRATES THE COMMISSION'S ABILITY TO FULFILL ITS CHARTER-MANDATED FUNCTION TO ADVISE THE CITY COUNCIL ON GENERAL PLAN AMENDMENTS.

In a disturbing pattern and practice, the City Planning Department has refused to release the Final EIR to the public prior to the City Planning Commission's hearing. This practice is symptomatic of not only a lack of transparency, but an effort to thwart meaningful public participation and an opportunity to bring problems with the City's process or analysis to the attention of a key decision maker – this Commission – so that they can be corrected.

The public has commented on the HCPU DEIR, but this Commission and the public have been denied seeing the City's responses to the comments. Such conduct not only disrespects the concerned public the City is supposed to serve, but it disrespects this Commission, and the role it plays, in City decision making, including whether or not the City has proceeded in accordance with CEQA and all other applicable laws.

Very truly yours,

/s/ Robert P. Silverstein

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

cc: Priya Mehendal (via email priya.mehendale@lacity.org)
Linda Lou (via email linda.lou@lacity.org)
Sophia Kim (via email sophia.kim@lacity.org)
Quetzalli Enrique (via email quetzalli.enrique@lacity.org)



February 11, 2021

Los Angeles City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

SENT VIA EMAIL ONLY

Re: TreePeople's Comments on the Hollywood Community Plan Update, City EIR No. ENV-2016-1451-EIR, CPC-2016-1450-CPU, State Clearinghouse No. 2016041093

Dear Hearing Officer:

TreePeople is an environmental non-profit organization based in Los Angeles. TreePeople unites the power of trees, people, and nature-based solutions to grow a more climate-resilient city as the region faces historic drought and a hotter, drier future. Our mission is to inspire, engage and support people to take personal responsibility for the urban environment, making it safe, healthy, fun and sustainable and to share our process as a model for the world. In the past 45 years, we have engaged more than 3 million people in planting and caring for more than 3 million trees throughout Los Angeles County.

I am writing to support the Hollywood Community Plan Update's Policy PR3.1 Preserve Open Space, which aims to: "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".

To further the goals of this policy, TreePeople recommends that the City re-zone to "Open Space" all land currently owned by Laurel Canyon Land Trust, the Mountains Recreation and Conservation Authority, and the Santa Monica Mountains Conservancy. In doing so, the City of Los Angeles can add an additional layer of protection to these open space parcels and demonstrate a commitment to the admirable goal of increasing open urban space for the City's residents.

Respectfully,

A handwritten signature in black ink, appearing to read "Manny Gonez".

Manny Gonez
Director of Policy Initiatives
TreePeople



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

February 11, 2021

TO: Members of the Public

FROM: City Planning Staff

ADDITIONAL INFORMATION FOR THE HOLLYWOOD COMMUNITY PLAN UPDATE

To assist in your review of the Hollywood Community Plan and staff report we would like to refer you to a few other helpful resources:

Community Plan Story Map:

This interactive map shows all proposed zoning changes within Hollywood. Users can zoom in and out, select parcels to see before/after land use and zoning, as well as plan boundaries, street names, neighborhood council areas, and council districts.

<https://ladcp.maps.arcgis.com/apps/MapSeries/index.html?appid=f9d1d0ccda5f40d09b93e213cf1bccf1>

CPIO Story Map:

This is similar to the above story map, but focuses on the CPIO subareas

<https://ladcp.maps.arcgis.com/apps/MapSeries/index.html?appid=c7784b219ef845269c15b0cb4f048ef2>

Reference Materials:

Here we have a collection of topical summary documents highlighting how the plan addresses issues such as climate change, housing, protecting renters, hillsides, historic preservation, video recordings of past webinars etc. Follow the link, and then click the yellow "Hollywood Documents" bar.

<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#resources>

Staff Report & Exhibits:

For your easy reference, the staff report and exhibits are all linked here:

<https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>

DAY OF HEARING SUBMISSIONS

February 17, 2021

Ms. Samantha Millman
President, City Planning Commission
201 N. Figueroa Street
Los Angeles, CA 90012

Dear Ms. Millman,

Thank you for the opportunity to comment on the forthcoming update to the Hollywood Community Plan. The advancement of this draft plan marks an important accomplishment for Hollywood after decades of labor, and we are deeply appreciative of the Department of City Planning's work in this arena.

Council District 4 is committed to advancing tenant protections and expanding affordable housing in Los Angeles, and we believe there are several areas within this plan that can be strengthened to ensure equitable and affordable development in Hollywood. Namely, we believe the plan can enshrine more robust protections against tenant displacement, be more ambitious in its offering of affordable housing incentives, and take additional steps to protect open space in the Santa Monica mountains. We'll expound upon each of these priorities one at a time.

Council District 4 shares and supports the priorities of the Just Hollywood Coalition around developing a more robust set of anti-displacement tools for the residents of Hollywood. We believe that replacement RSO units in redeveloped properties should not count towards the affordability requirements therein, but rather should be preserved in addition to new affordable units. We believe that new affordability covenants in Hollywood should follow in the lead of Santa Monica, New York City, and other cities and extend in perpetuity, not their current 55-year time horizon. We further support the Just Hollywood Coalition's demand for increased public input on hotel projects, requiring conditional use permits appealable to the City Council and restricting the conversion and demolition of housing for the development of hotels.

On the issue of affordable housing, CD4 believes strongly that the Hollywood CPIO's incentives should go further than those within the City's Transit Oriented Communities Program, and thereby serve as a model for incentivizing affordable housing in high-opportunity neighborhoods across Los Angeles. To achieve this, we support more ambitious affordable housing percentages within incentive programs that allow for increased density, as well as the removal of parking requirements for 100% affordable projects. We oppose the proposed height limits on Sunset Blvd. in Corridor 5 and the proposed height reductions on Hillhurst Ave. in Los Feliz and on portions of Hollywood Blvd. and Melrose Ave. We support opportunities for increasing allowable height along these corridors only for projects that demonstrate a substantial commitment to affordable housing.

Finally, we believe that the Hollywood Community Plan can go further in preserving our fragile and unique ecosystem in the Santa Monica Mountains. To forever protect gains made in this arena, all lands acquired by the Santa Monica Mountains Conservancy (SMMC) and Mountains Recreation and Conservation Authority (MRCA) should be rezoned to open space as part of the update. In addition, city-owned land in the Santa Monica Mountains that exists within the Hollywood Community Plan should be rezoned as open space as well, as part of the implementation plan for "open space preservation" set out in the Draft Plan.

We understand that this will not be the last opportunity to contribute to the Hollywood Community Plan Update, and we will continue to work with the Department of City Planning and other associated departments to incorporate comments from the City Planning Commission and the public in the coming weeks. Thank you once again for your indefatigable work in updating our city's Community Plans. We hope that our comments are constructive in furthering this work, and look forward to working closely alongside you as this draft plan is finalized.

A handwritten signature in black ink that reads "Nithya Raman". The signature is written in a cursive, flowing style.

Los Angeles City Councilmember Nithya Raman, 4th District



Planning CPC <cpc@lacity.org>

Affordable Housing

Aryeh Avila <avila.hours@gmail.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Feb 17, 2021 at 10:02 PM

Greetings Reader,

I hope you are doing well.

I am reaching out because I received your sirens mail for the proposed Hollywood community plan that doesn't include affordable housing. I am huge proponent that we need more entry level/ affordable style infrastructure. I think there should be new construction that scales depending on what needed most to make sure everyone is housed. For example making a 250-450 sq ft apartments. And that while keeping rent low to add in a style HOA type fee to make sure these styles of housing will be properly maintained inside and out to beautify the city and give people a comfortable confident living space.

I would love to know how I can be a part of this.

Thank You for your time.

Take care!

-Ari Avila



Planning CPC <cpc@lacity.org>

Support of proposed CPIO draft

Amy Cotteleer <amycotteleer@gmail.com>

Wed, Feb 17, 2021 at 10:41 PM

To: cpc@lacity.org, linda.lou@lacity.org

Hello,

I'm a homeowner in the Sunset Square neighborhood. I'm writing to express my strong support of the proposed CPIO draft and request that it remains as is [CPIO draft, pages 48-62, i.e., Sunset Blvd from Fairfax east to Vista].

As a community we had specific reasons for asking for, and being given, the current proposed zoning in the CPIO, including:

- a public elementary school that was previously threatened by inappropriate zoning
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes,
- The complete appropriateness of current height designation for 3 story residential
- The complete appropriateness of preserving the commercial corner,
- The complete appropriateness of neighborhood friendly commercial
- And last, but certainly not least, TWO 100+ year old HPOZ neighborhoods which directly abut these 10 blocks.

Thank you in advance for your support in this matter.

Best,
A



RE: Hollywood Community Plan Update

Alek <alek3773@gmail.com>
 Reply-To: Alek <alek3773@gmail.com>
 To: cpc@lacity.org
 Cc: per.planning@lacity.org

Wed, Feb 17, 2021 at 12:48 PM

Dear City Representative,

I'm a Hollywood resident, for 30 (!) years. I've also been a member of the Beautification Committee for the Central Hollywood Neighborhood Council.

My main suggestion for the Hollywood improvements is concerning the sidewalks. Namely, it's time to implement decorative pavers, in and around Hollywood. And not just for the Walk-of-Fame (the current Terrazzo slippery & unsafe material needs an overhaul), but on all major adjacent streets. Please realize: Pavers / Decorative Sidewalk is not a luxury, or superficial improvement. -- **Pavers are a fundamental necessity** for a pedestrian environment, walkability, and aesthetics. For too many years, quality and aesthetics of sidewalks have been neglected in the city of L.A.

Personally, I've traveled all across the U.S., and visited many European cities. And as such, Los Angeles has the worst walkability and aesthetics (sorry to say), as we've built nothing better for pedestrians than utilitarian concrete & cement! -- And this includes Hollywood. It is time to update the citywide Design Guidelines.

*Attached please find examples of pavers, used in various cities all across the U.S.

So, here is my statement -- both as a local resident and a CHNC member of the Beautification Committee: No matter what "Improvements" you plan to implement in Hollywood (including *zone changes, furnishings, trees, goals & policies*, etc.) -- this will barely make a difference as long as you continue to neglect the Sidewalk Material. Therefore, I strongly urge you to include decorative pavers as a part of the Community Plan Update. Time to get rid of the utilitarian, naked concrete & cement -- and place pavers instead, as it's done all over the world!

Streets like Sunset Blvd., La Brea Ave., Highland Ave., Hollywood Blvd., Selma Ave., Vine Street, and many others -- all need an overhaul to the sidewalks.

Thank you for your consideration.
 Sincerely,

~ Alek Friedman
 Hollywood, California
 323 . 465 . 8511

ATTACHMENTS

13 attachments



Paver 30.jpg
 184K

Paver 31.jpg
 93K



Paver 02.jpg
84K



Paver 03.jpg
151K



Paver 04.jpg
129K



Paver 05.jpg
169K

Paver 12.jpg
116K



Paver 14.jpg
34K



Paver 16.jpg
114K

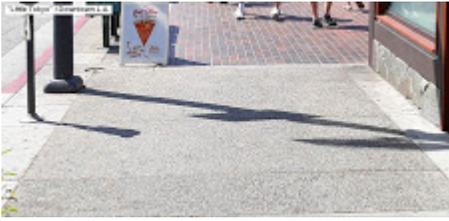


Paver 20a.jpg
115K



Paver 22.jpg
288K

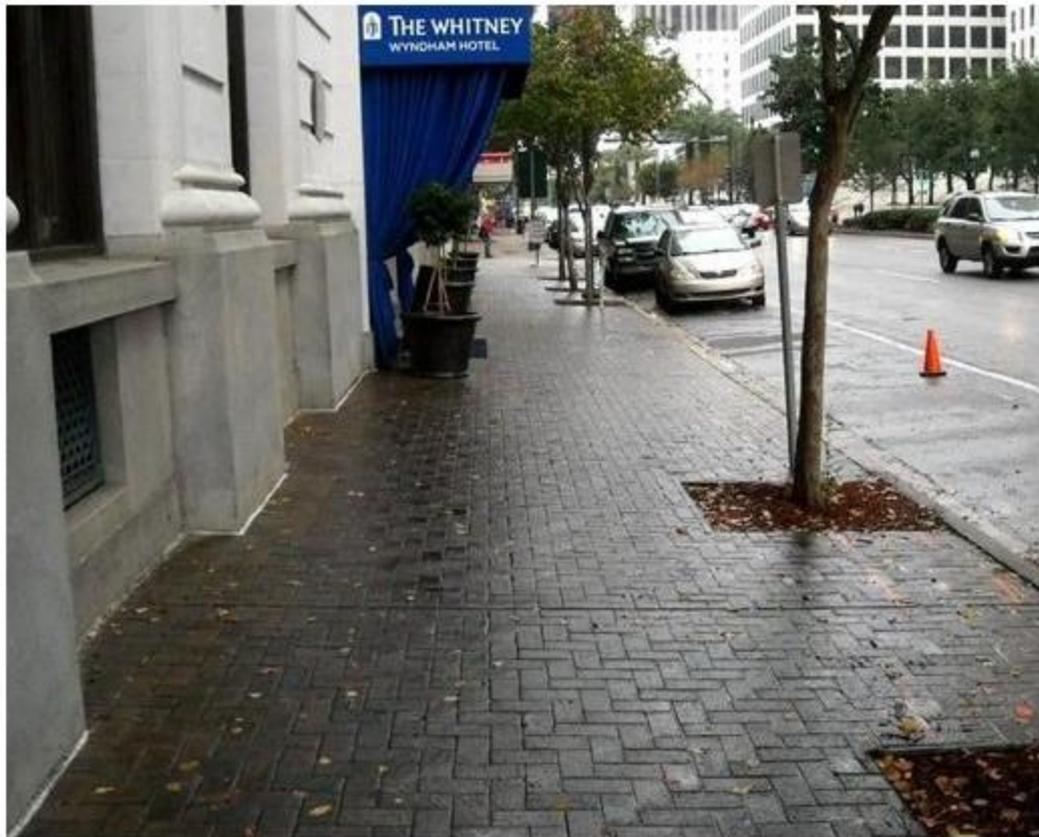
Paver 28b.jpg
163K



 **PRINTABLE Collage Pavers 01.jpg**
200K



GREAT EXAMPLES OF DECORATIVE, PEDESTRIAN-FRIENDLY SIDEWALKS





















"Little Tokyo" / Downtown L.A.



Downtown Santa Monica, CA



NAVIGATOR
MotorCoaches, Inc.
Meridian, Nebraska
US DOT 685273
CC 259429

EARLY ACCESS
COURTESY
OF
701

Hollywood, CA
(Selma Ave., west of Schrader)





Planning CPC <cpc@lacity.org>

COMMENT ON HOLLYWOOD COMMUNITY PLAN - MEETING SCHEDULED FOR TODAY

Armen Makasjian <armenmak@yahoo.com>

Thu, Feb 18, 2021 at 8:18 AM

To: Planning CPC <cpc@lacity.org>

Honorable Commission Members;

I am a long-time resident in Hollywood. I also served four years as a board member and planning committee member of the East Hollywood Neighborhood Council. The Hollywood Community Plan's proposal to increase building height and density presents numerous problems for our community. The major issue with increasing height limits in established residential neighborhoods is the destruction of the neighborhood character and charm, the very reason why residents desire to live in those areas. There have been numerous instances where developers demolished existing homes without receiving city authorization and have cause blight by the lack of maintenance of their properties. By giving them the "green light" to build structures that exceed current height limits, neighborhoods will lose their character. This will also cause increased density in neighborhoods where such buildings simply will not fit, especially on narrow streets and small lots. Many lots are under 7,500 sq.ft. By increasing height limits and density, residents will be squeezed into tight areas, creating traffic and congestion, forcing an exodus of long-time residents. This is exactly what is happening in most neighborhoods where large-scale projects are being constructed. In my experience when dealing with builders and project applicants, I find that they often refuse to work with neighbors and fail to build projects that blend with the surrounding properties.

I urge you to study this issue with care. Many neighborhoods are already experiencing blight and congestion due to increased density resulting in long-time residents moving out of the area.

Thank you.

Armen Makasjian
5111 Santa Monica Blvd.
Los Angeles, CA 90029



Planning CPC <cpc@lacity.org>

City Planning Case: CPC-2016-1450-CPU

allison schallert <allisonschallert@gmail.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 2:58 PM

Good Day

Please stop all the give aways to developers by requiring affordable units in every new building. We need everyone to take responsibility to end our housing crisis! We need AFFORDABLE HOUSING NOT LUXURY now!
thanks allison schallert cd4

ALSTON & BIRD

333 South Hope Street, 16th Floor
Los Angeles, CA 90071-1410
213-576-1000 | Fax: 213-576-1100

Edward J. Casey

Direct Dial: 213-576-1005

Email: ed.casey@alston.com

February 16, 2021

VIA EMAIL

linda.lou@lacity.org

City of Los Angeles Planning Commission
200 N. Spring Street
Los Angeles, CA 900112
Attn: Linda Lou, City Planner

Re: Hollywood Community Plan

Dear Ms. Lou:

This firm represents Hudson Pacific Properties (“Hudson”), the owner of Sunset Las Palmas Studios. We send this letter to address two aspects of the Draft Hollywood Community Plan (Hollywood Plan Update). We appreciate all of the hard work and community outreach that the City has invested in the Hollywood Plan Update. An updated Hollywood community plan that matches the evolving needs of the Hollywood community is critical to the success of this important area of the City.

Both of the issues that we address in this letter would affect Sunset Las Palmas Studios. By way of background, the Studio is approximately 15 acres bounded by W. Santa Monica Boulevard to the north, W. Barton Avenue to the south, N. Las Palmas Avenue to the west and N. Seward Avenue to the east. Romaine Street bifurcates the 15 legal parcels on the “Main Lot” on the north side of the street and the nine legal parcels on the “Lower Lot” on the south side of the street. The Studio is composed of a collection of facilities first developed as Hollywood Studios in 1919, as well as a number of adjacent buildings subsequently acquired in an expansion of the Studio’s facilities. The Studio is comprised of a collection of production stages, support buildings, bungalows, a parking structure, and surface parking lots.

Hudson has direct experience in modernizing studio production facilities. For example, Hudson owns the 10.55-acre Sunset Bronson Studios media and entertainment campus which was the location of the original Warner Brothers Studio. Given Hudson’s significant improvements to these studios, SBS serves as a multi-use property which includes office, production, post-production and support. Hudson removed various structures and constructed in their place a 14-story vertical office campus and five-story production office building. Hudson also owns the 16.5-acre Sunset Gower Studios campus which is an existing production studio on the former Columbia Pictures lot. The City Planning Commission has approved an expansion of the studio by preserving and enhancing most of the existing buildings on the lot and developing 619,942 square feet of new studio-related creative office, soundstages, production office/production support and storage uses on the site. Building on those successful redevelopment efforts, Hudson would, at some time in the

future, to modernize Sunset Las Palmas Studios. Many of the buildings are decades-old and certain facilities that are necessary for the continued success of the Studio are not present at the site.

With that need in mind, we bring to the Commission's attention two aspects of the Plan Update that we believe should be modified to provide greater flexibility to development in this area. Specifically, our comments concern Subarea 40:1B and Subarea 40:2 in the Plan Update. Subarea 40:1B would encompass the Main Lot at the Studio property, while Subarea 40:2 would cover the Lower Lot at the Studio property.

First, the Studio property lacks sufficient space devoted to creative office use and such space is critical to attracting the type of talent necessary to successfully maintain the Studio. Further, the long term viability of production stages require creative office buildings at a height that is greater than 36 feet, and that increased height is also critical for new production stages. Thus, in order to house those uses in a single building as opposed to developing smaller office buildings throughout the Studio property (which take away from production facilities), we are concerned about a proposed Q condition in the Plan Update's Zone Change Map and Matrices that would limit height. Specifically, [Q] M1-2D-2N for Subarea 40:1B would limit the height of buildings fronting Santa Monica Boulevard between McCadden Place and Lillian Way to 36 ft above grade. To allow for flexibility in the future for a major new creative office building at the Studio, we would suggest modifying that provision to read as follows: "No building or structure shall exceed a height of 36 feet above grade, except for commercial buildings permitted as a MR1 use on property zoned as M1, which buildings would be subject to the height limitation for MR1 or M1 zones." Not applying a height limit of 36 feet to commercial buildings in those zones on the Studio property would be consistent with the production stages along Santa Monica Boulevard that are taller than 36 feet.

The second aspect of the Plan Update that we would like to comment on concerns the prohibition against residential development in Subarea 40:2. To promote a vibrant community of creative talent for the Studio and to develop a more sensitive use with the existing residential uses along Barton Avenue immediately to the south of the Studio, we believe that developing apartments and similar residential uses on the Studio property should be permitted. Therefore, we would suggest that modifications be made to [Q] M1-2D-2N for Subarea 40:1B and to [Q] M1-2D for Subarea 40:2 so that those conditions would provide as follows: "No residential development shall be permitted except for (i) a watchman or caretaker as permitted by the M1 zone or (ii) multi-family residential units on a campus of entertainment production uses." Allowing for residential uses at the Studio property would be consistent with the surrounding neighborhood to the south.

We again appreciate the City's effort in developing the Hollywood Plan Update and look forward to working with the City to develop refinements that will further improve the Plan Update.

Very truly yours,



Edward J. Casey

EJC:dte

cc: Ms. Priya Mehendale, Sr. City Planner (Via E-Mail)
Priya.mehendale@lacity.org



CPIO/HCPU

Barbara Bagley <rosenthalb@ca.rr.com>
To: cpc@lacity.org, linda.lou@lacity.org
Cc: Cheryl Holland <hollandc@me.com>

Thu, Feb 18, 2021 at 6:18 AM

Dear CPC: We support the proposed CPIO draft and want it to remain as is [CPIO draft, pages 48-62, i.e., Sunset blvd from Fairfax east to Vista]. We have been homeowners in Sunset Square since 2010 and are well served by the current configuration of Sunset from Fairfax to Vista. We are stunned to hear that our City Councilperson is opposed to this, after voicing her support during the campaign. There is no reason to oppose the current draft, which considers the factors below.

- a public elementary school that was previously threatened by inappropriate zoning*
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes,*
- The complete appropriateness of current height designation for 3 story residential*
- The complete appropriateness of preserving the commercial corner,*
- The complete appropriateness of neighborhood friendly commercial*
- And last, but certainly not least, TWO 100+ year old HPOZ neighborhoods which directly abut these 10 blocks*

We appreciate your consideration of the opinions of Sunset Square homeowners and consumers.

Barbara & Dave Bagley
1650 N. Orange Grove Ave.
Los Angeles, CA 90046

rosenthalb@ca.rr.com



CPC 2016-1450-CPU, ENV-2016-1451-EIR, including proposed Amendments to the Hollywood Redevelopment Plan ("ordinance/clarification")

Beth Dorris <beth.dorris@aol.com>

Thu, Feb 18, 2021 at 8:23 AM

Reply-To: Beth Dorris <beth.dorris@aol.com>

To: "cpc@lacity.org" <cpc@lacity.org>

This comment is on behalf of Hollywood Heritage, Inc. Hollywood Heritage opposes the proposed ordinance/clarification purporting to amend the Hollywood Redevelopment Plan. The proposed ordinance unlawfully seeks to eliminate or modify provisions of the Hollywood Redevelopment Plan (HRP) protecting cultural or historic resources. Among the HRP provisions that would be deleted or modified are Section 4.1 and others in Chapter 4 of the Hollywood Redevelopment Plan - provisions that the City of Los Angeles did not request transfer to itself or its planning department in its prior ordinance requesting transfer of particular land use planning and authority from the current CRA/LA. In addition, the proposed ordinance would unlawfully conflict with or unconstitutionally impair contractual obligations of the City of Los Angeles (including its planning department) and/or the current CRA/LA to Hollywood Heritage under settlement agreements with Hollywood Heritage, Inc. Those settlement agreements contain express contractual obligations in land use planning and authority to preserve historic resources in Hollywood - contractual obligations that are designed to remain regardless of changes to the Hollywood Redevelopment Plan. In addition, the proposed ordinance clarification deletes or undermines historic resource protections and aesthetic protections and mitigations previously adopted or included without deletion or modification as to cultural, historic, and/or aesthetic impacts of the proposed Community Plan and associated actions in the draft EIR thereon, As a result the new ordinance/clarification leaves unstudied significant material aesthetic/cultural resources impacts.



Planning CPC <cpc@lacity.org>

Community Plan

Brian Jenkins <brjenkins@me.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 9:20 AM

Dear Hollywood Community Plan,

I am writing to show my support for the Hollywood Community Plan. This document is critical for the future development and economic prosperity of the Hollywood region. This region has seen a tremendous increase in jobs and business growth for some time now and must be treated as a critical economic driver for the City of Los Angeles.

After the last public hearing, certain amendments have been made but there are still many that were not incorporated within this new draft. Thank you to the Planning Department and Planning Commissioners for listening to the public and incorporating some of our changes.

The most critical change made in this latest modification was the reduction of base FAR from 4.5:1 to 3:1. Our community is in the midst of a housing and economic crisis. Now is the time to make bold decisions and create opportunities for higher density which will lead to increased housing units and commercial square footage. We ask that you do not approve this change and revert back to the original proposal of 4.5:1 base FAR. It is important to make decisions which will lead to increased economic development in Hollywood.

Thank you,

Brian Jenkins
(617) 717-4714



CPIO DRAFT MUST REMAIN AS IS

Bonnie Sikowitz <bonniesikowitz@me.com>
 To: cpc@lacity.org, linda.lou@lacity.org

Wed, Feb 17, 2021 at 11:34 PM

Dear Ms. Zwick & Ms. Healy -

*As a homeowner in Sunset Square (1601 N. Orange Grove Ave.) I am writing to **URGE YOU TO DISREGARD Councilperson Raman's ILL-CONSIDERED LAST MINUTE OPPOSITION LETTER to the proposed zoning on the residential/hpoz part of Sunset Blvd., from Fairfax East to Vista. I urge you to pass the CPIO draft as is.** I have lived in my 100 year old home for 16 years with my husband and 2 children. During this time, my neighbors and I have worked diligently and in good faith with City planners toward this current draft. This draft is over a decade in the making and great thought, cooperation and collaboration has gone into it.*

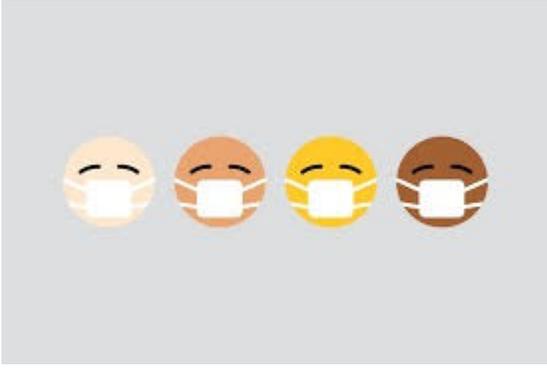
Sunset Square is one of the last historic residential walking neighborhoods in Hollywood, and one of the most recent HPOZs. Our walking neighborhood is primarily made up of young families with children under 10 years of age. Ms. Raman's ill-considered letter of objection seems ingnorant of these facts, as well as several other very specific reasons for asking for, and being given, the current proposed zoning in the CPIO draft, pages 48-62, i.e., sunset blvd from fairfax east to vista, not the least of which is:

- a public elementary school that was previously threatened by inappropriate zoning*
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes,*
- The complete appropriateness of current height designation for 3 story residential*
- The complete appropriateness of preserving the commercial corner,*
- The complete appropriateness of neighborhood friendly commercial*
- And last, but certainly not least, TWO 100+ year old HPOZ neighborhoods which directly abut these 10 blocks.*

I URGE YOU TO PLEASE PASS THE CPIO DRAFT AS IS (disregarding Councilperson Raman's unconsidered objections). Thank you.

Bonnie

Bonnie Sikowitz
 1601 N. Orange Grove Ave.
 Los Angeles, CA 90046





Public Comment on Case Number CPC-2016-1450-CPU / Hollywood Community Plan Update

Cory Grenier <cory.grenier@geenee.me>

Wed, Feb 17, 2021 at 8:51 PM

To: cpc@lacity.org

February 17, 2021

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is Cory Grenier, and I am a commercial tenant and technology business operator located at [1604 N Cahuenga Blvd suite b, Los Angeles, CA 90028](#) in Hollywood. It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges such as congestion and housing affordability while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong. As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan. Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood.

I look forward to Hollywood continuing to be a source of economic vitality, innovation, and an environment conducive to attracting world-class talent.

Respectfully,

Cory

[Cory Grenier | Geenee Inc.](#)
Chief Executive Officer
650-691-3009
[Schedule a Meeting with Cory](#)



HCPU2/This last minute sandbag is OUTRAGEOUS

Cheryl Holland <hollandc@me.com>

Wed, Feb 17, 2021 at 8:48 PM

To: jesse.zwick@lacity.org, "Nithya.Raman@lacity.org" <Nithya.Raman@lacity.org>, meg.healy@lacity.org

Dear Ms. Zwick & Ms. Healy, and C-person Ramen: As president of sunset square neighborhood org, I am completely OUTRAGED by Nithya's last minute letter opposing proposed zoning on the residential/hpoz part of Sunset Blvd, from Fairfax east to vista. We have spent YEARS working on appropriate zoning for our sensitive part of Sunset Blvd, zoning which is suitable and required for our residential community. We have very specific reasons for asking for, and being given, the current proposed zoning in the CPIO draft, pages 48-62, i.e., sunset blvd from fairfax east to vista, not the least of which is:

- a public elementary school that was previously threatened by inappropriate zoning
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes,
- The complete appropriateness of current height designation for 3 story residential
- The complete appropriateness of preserving the commercial corner,
- The complete appropriateness of neighborhood friendly commercial
- And last, but certainly not least, TWO 100+ year old HPOZ neighborhoods which directly abut these 10 blocks.

Do you have any knowledge WHATSOEVER about our area? Do you know WHY the HCPU planners granted us the zoning in the current draft? Is the reason for your letter in opposition based on ignorance or betrayal? We are residents of this community and we DEMAND you withdraw this opposition. You promised during your campaign to honor and protect our HPOZ's. What happened to this commitment????????? The current CPIO draft, an excellent and well-thought out draft, does exactly what YOU promised. I cant even begin to express how damaging your letter letter in opposition is to YOUR constituents. **You didn't even reach out to us before sending that inappropriate, ill thought-out, ignorance-betraying letter.** Seriously, how dare you? These are OUR NEIGHBORHOODS and we are YOUR constituents. Please start representing our needs and interests. Cheryl Holland

cheryl holland president | sunset square neighborhood org | sunsetsquarehollywood.org



February 17, 2020

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

Re: Hollywood Community Plan Update, CPC-2016-1450-CPU, ENV-2016-1451- EIR
Preservation of Open Space in Laurel Canyon

Members of the City Planning Commission,

As the City continues the process of updating the Hollywood Community Plan, I am writing to ask the Commission to consider the importance of preserving remaining open space in Laurel Canyon. Laurel Canyon is an environmentally sensitive area that includes habitat for a number of species in the Santa Monica Mountains.

While the Hollywood Community Plan includes policy language regarding the preservation of open space, there are few specifics. The Santa Monica Mountains in general and the Laurel Canyon area in particular have seen their environmental integrity degraded in recent years due to a number of development projects that have shown little or no regard for the surrounding context. The Hollywood Community Plan must include specific language that will provide clear guidance for the protection of open space/green space.

I support the recommendation of the Laurel Canyon Land Trust (LCLT) that the City rezone to "Open Space" all land currently owned by Laurel Canyon Land Trust, the Mountains Recreation and Conservation Authority and the Santa Monica Mountains Conservancy. This will provide additional protection for this land, preserving natural vegetation, mature trees and habitat. LCLT also recommends that all vacant/excess lands owned by the City and its subsidiaries (such as the Los Angeles Department of Water and Power) be rezoned to Open Space. The City owns a number of parcels in the Hollywood Hills, including Laurel Canyon. As you know, the area's population of mountain lions has declined precipitously in recent decades. Acting to preserve remaining open space in Laurel Canyon (and throughout the Santa Monica Mountains) would help protect this endangered species.

I urge the Commission to recommend the inclusion of specific language in the Hollywood Community Plan regarding the rezoning to "Open Space" of all land currently owned by Laurel Canyon Land Trust (LCLT), the Mountains Recreation and Conservation Authority and the Santa Monica Mountains Conservancy, in addition to land owned by the City of LA.

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



DRAFT HOLLYWOOD COMMUNITY PLAN HCPU2 CPC-2016-1450-CPU

Christine OBrien <obrienmills@roadrunner.com>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 8:34 AM

2/18/2021

DRAFT HOLLYWOOD COMMUNITY PLAN HCPU2
CPC-2016-1450-CPU

Dear Planning Commissioners and Planning Staff:

Relative to CD4's input, please recognize our opposition to the incentives and the across-the-board upzoning, an action that will create a transportation nightmare on Franklin Avenue. Franklin is the only transportation outlet for the hills. In addition, advocating for affordable units without parking will only work if leasees and renters of these units are exempt from owning/leasing vehicles while living in the units. Effectiveness for this "no parking" proposal must show consistency in use or you are wrongly encumbering others of a parking burden.

We urge the councilwoman to retract these positions and meet with constituents to properly vet and understand their safety concerns and impacts of densification.

Relative to the numerous documents I have submitted on the proposed Plan (9/10/2017, 1/30/2019, 12/2/2019), I am puzzled why many valid and substantiated statements have been dismissed, not acted on or regurgitated and reinterpreted to create an unworkable and unrealistic plan.

I am especially concerned about the continued incorrect reclassification of Beachwood Drive, the lack of understanding of the Lake Hollywood Pocket Park, the lack of recognition that there are no official park openings from Hollywoodland tract 6450, residential/openspace. To identify a residential community in the same breathe as the walk of fame and elements in the flats of Hollywood is illogical.

You have ignored the limited safety related infrastructure issues that Hollywoodland is burdened with as well as the Significant Ecological Area and Very Severe Hazard Fire Zone it is immersed in.

Please take the time to represent the people, the facts and property rights so we can all have a workable plan and livable, safe city.

Respectfully,

Christine Mills O'Brien
Hollywoodland, Hollywoodland Gifted Park

February 17, 2021

Ms. Samantha Millman
President, City Planning Commission
201 N. Figueroa Street
Los Angeles, CA 90012

Dear Ms. Millman,

Thank you for the opportunity to comment on the forthcoming update to the Hollywood Community Plan. The advancement of this draft plan marks an important accomplishment for Hollywood after decades of labor, and we are deeply appreciative of the Department of City Planning's work in this arena.

Council District 4 is committed to advancing tenant protections and expanding affordable housing in Los Angeles, and we believe there are several areas within this plan that can be strengthened to ensure equitable and affordable development in Hollywood. Namely, we believe the plan can enshrine more robust protections against tenant displacement, be more ambitious in its offering of affordable housing incentives, and take additional steps to protect open space in the Santa Monica mountains. We'll expound upon each of these priorities one at a time.

Council District 4 shares and supports the priorities of the Just Hollywood Coalition around developing a more robust set of anti-displacement tools for the residents of Hollywood. We believe that replacement RSO units in redeveloped properties should not count towards the affordability requirements therein, but rather should be preserved in addition to new affordable units. We believe that new affordability covenants in Hollywood should follow in the lead of Santa Monica, New York City, and other cities and extend in perpetuity, not their current 55-year time horizon. We further support the Just Hollywood Coalition's demand for increased public input on hotel projects, requiring conditional use permits appealable to the City Council and restricting the conversion and demolition of housing for the development of hotels.

On the issue of affordable housing, CD4 believes strongly that the Hollywood CPIO's incentives should go further than those within the City's Transit Oriented Communities Program, and thereby serve as a model for incentivizing affordable housing in high-opportunity neighborhoods across Los Angeles. To achieve this, we support more ambitious affordable housing percentages within incentive programs that allow for increased density, as well as the removal of parking requirements for 100% affordable projects. We oppose the proposed height limits on Sunset Blvd. in Corridor 5 and the proposed height reductions on Hillhurst Ave. in Los Feliz and on portions of Hollywood Blvd. and Melrose Ave. We support opportunities for increasing allowable height along these corridors only for projects that demonstrate a substantial commitment to affordable housing.

Finally, we believe that the Hollywood Community Plan can go further in preserving our fragile and unique ecosystem in the Santa Monica Mountains. To forever protect gains made in this arena, all lands acquired by the Santa Monica Mountains Conservancy (SMMC) and Mountains Recreation and Conservation Authority (MRCA) should be rezoned to open space as part of the update. In addition, city-owned land in the Santa Monica Mountains that exists within the Hollywood Community Plan should be rezoned as open space as well, as part of the implementation plan for "open space preservation" set out in the Draft Plan.

We understand that this will not be the last opportunity to contribute to the Hollywood Community Plan Update, and we will continue to work with the Department of City Planning and other associated departments to incorporate comments from the City Planning Commission and the public in the coming weeks. Thank you once again for your indefatigable work in updating our city's Community Plans. We hope that our comments are constructive in furthering this work, and look forward to working closely alongside you as this draft plan is finalized.

A handwritten signature in black ink that reads "Nithya Raman". The signature is written in a cursive, flowing style.

Los Angeles City Councilmember Nithya Raman, 4th District

Memorandum

To: Members of the Los Angeles City Planning Commission
From: Craig Lawson, Craig Lawson & Co., LLC
Date: February 16, 2021
RE: Hollywood CPU (CPC-2016-1450-CPU) - Comments on Medical Facilities in East Hollywood

Craig Lawson & Co., LLC (“CLC”), a land use consulting firm, has prepared this Memorandum regarding the proposed Hollywood Community Plan Update (“HCPU”) in the City of Los Angeles (the “City”). We appreciate your review of this Memorandum.

The major hospitals and adjoining medical facilities concentrated in East Hollywood, including Hollywood Presbyterian Medical Center, Children’s Hospital of Los Angeles, and Kaiser Permanente Los Angeles Medical Center, are vital resources for the City which provide transit-adjacent jobs and health care services for residents. The HCPU is an opportunity to further acknowledge the importance of these existing medical campuses and make it feasible for these institutions to meet the region’s future health care needs, while encouraging development that enhances the existing neighborhood, improves walkability and encourages transit usage.

For the reasons stated in this Memorandum, we ask that you revise the HCPU to include the following:

1. Further recognize these regional medical facilities and their importance to the community and the City by referencing them in the Guiding Principles and Community Themes.
2. Under Short Term Programs (7-4), clarify Program P15 to emphasize that future revisions of the Vermont - Western TOD Station Neighborhood Area Plan (the “SNAP”) should go beyond “reflecting legislative changes” and the revisions should consider changes in ownership and development patterns in the East Hollywood area to plan for future expansion of medical facilities. For example, future revisions to SNAP should explore expanding SNAP Subarea C (with the hospital incentives) to the east along Sunset Blvd.
3. Recognize that for patient safety and security reasons, medical buildings cannot always include ground floor uses that open toward a major boulevard or street level pedestrian connections. Please clarify language in the HCPU Land Use Goals and Policies to allow medical facilities more flexibility in ground floor uses and pedestrian connections (above and below grade).
4. State that it may be desirable to close or vacate smaller streets and alleys that bisect existing and expanding medical campuses to encourage the further expansion and modernization of these important medical centers.

We have requested the proposed revisions for the following reasons:

- 1. The existing medical facilities are essential to the health and vitality of the City and need to be able to grow as the City grows. Land Use regulations should be updated to accommodate modern medical facility needs.**

As the COVID-19 Pandemic has shown us, quality medical facilities are an essential part of a sustainable and resilient City. The cluster of medical facilities in East Hollywood are not only some of our community’s largest employers, but they are nationally known for their excellence in various specialties as well as for their community impact. Here are three examples:

- Hollywood Presbyterian Medical Center at 1300 N. Vermont Avenue (north of Fountain Ave.)

- Ranked as a high-performing hospital for heart failure by U.S. News and World Report¹.
- Recognized as the 2018 Healthcare Provider of the Year by the Asian Business League for serving all economic sectors and culturally diverse group of patients.²
- Children’s Hospital of Los Angeles at 4650 Sunset Blvd. (at Vermont Ave.)
 - Ranked as the top children’s hospital in California by U.S. News and World Report.³
 - Provides \$336 million of community impact annually.⁴
- Kaiser Permanente Los Angeles Medical Center at 4867 Sunset Blvd. (west of Vermont Ave.)
 - Ranked 39th nationally for neurology by U.S. News and World Report.⁵
 - Provided over \$59 million in community benefits in 2019.⁶

All three of these medical centers have long histories in the neighborhood and have continually expanded their campuses as they have grown over the decades. Given the long term nature of the HPCU, it is important that the HCPU allows for these medical centers to continue to grow and modernize to meet community needs in the coming decades.

2. Although medical campuses may need unique accommodations like street vacations and pedestrian bridges, the overall effect of their presence can increase transit usage and pedestrian activity by locating jobs next to an existing subway station.

The cluster of medical centers around the Vermont/Sunset Metro Rail Station together employ over 10,000 local employees and, as the draft HCPU notes, represent nearly 10% of the jobs in Hollywood⁷. Recent studies have noted that much of the focus of “transit-oriented” development has focused on the origin side of a trip, i.e., in dense residential development⁸, but concentrated employment uses have been found to be more closely associated to transit ridership than dense residential uses.⁹ Although pedestrian features like ground floor retail, short blocks and street level pedestrian crossings generally encourage pedestrian activity, medical buildings have unique operational and safety requirements that often make these features unfeasible. Rather than force new medical facilities to locate further from the core of the City, allowing flexibility for medical buildings to be exempted from these requirements can allow future medical services and job opportunities to be located in the City core which would encourage greater transit usage and pedestrian activity.

CONCLUSION

Therefore, we respectfully request that you consider revising the HCPU to include the recommendations contained in this Memo. The medical facilities in East Hollywood are vital resources for the community and City which provide transit-adjacent services and jobs for local residents. The HCPU is an opportunity to further acknowledge the importance of the existing medical campuses and facilitate the ability for these institutions to meet the region’s future health care needs.

¹ [Nationally Recognized for Quality Care - Article - Hollywood Presbyterian Medical Center](#)

² [CHA-HOLLYWOOD PRESBYTERIAN MEDICAL CENTER, RECEIVES “HEALTHCARE PROVIDER OF THE YEAR” AWARD FOR SERVING THE SOUTHERN CALIFORNIA COMMUNITIES - Hollywood Presbyterian Medical Center](#)

³ [2019 Annual Report | Children’s Hospital Los Angeles \(chla.org\)](#)

⁴ [2019 Annual Report | Children’s Hospital Los Angeles \(chla.org\)](#)

⁵ [Kaiser Permanente Los Angeles Medical Center in Los Angeles, CA - Rankings, Ratings & Photos | US News Best Hospitals Rankings](#)

⁶ [KFH-Los Angeles - Rev. 05.08.20 .docx \(kp.org\)](#)

⁷ [2019 Annual Report | Children’s Hospital Los Angeles \(chla.org\)](#); [CHA Hollywood Presbyterian Medical Center Breaks Ground on New Patient Care Tower - Hollywood Presbyterian Medical Center](#); Draft HCPU, 2-2, August 2020.

⁸ Dena Belzer, Sujata Srivastava; Jeff Wood, Ellen Greenberg, “Transit-Oriented Development and Employment.” Center for Transit-Oriented Development (May 2011)

⁹ Barnes, Gary. "The Importance of Trip Destination in Determining Transit Share." Journal of Public Transportation 8, no. (2005); Zupan, Jeffrey and Pushkarev, Boris. “Public Transportation and Land Use Policy.” Regional Planning Association (1977)



Planning CPC <cpc@lacity.org>

Re: HCPU2

danielle.mead@yahoo.com <danielle.mead@yahoo.com>

Wed, Feb 17, 2021 at 7:05 PM

To: "cpc@lacity.org" <cpc@lacity.org>

Dear CPC Members:

I live on Laurel Ave just north of Sunset Blvd and just east of Crescent Heights. Our neighborhood has been working for years on the Hollywood Community Plan Update, communicating and meeting directly with Linda Lou and others to ensure that the proposed zoning along Sunset Blvd west of La Brea was appropriate. This neighborhood is not the Sunset Strip or the regional center - is it a historic community with two HPOZs and multiple historic commercial buildings which have been noted on Survey LA. We worked closely with city planning on what eventually became the CPIO, balancing density and height increases with incentives for affordable housing with design standards that recognize the historic resources in this area.

Our new Councilmember Raman's opposition to the height limits along Sunset Blvd in Corridor 5 is a very minority opinion, and unfortunately comes without any education as to why those limits were proposed. She did **no** outreach to the community to understand the reasoning behind the height limits or how much time and conversation was had between neighbors and city planning officials over the past 10 years. I encourage you to disregard her uninformed comments and instead speak with Linda Lou and other city planning officials who understand why the height limits on Sunset Blvd in Corridor are necessary to protect our historic resources and encourage responsible development of affordable housing.

Regards,
Danielle Mead
Laurel Ave



Planning CPC <cpc@lacity.org>

RE: More deeper affordable housing in Hollywood Plan

Diane Valencia <diane@seaca-la.org>

Thu, Feb 18, 2021 at 8:51 AM

To: cpc@lacity.org

Hi my name is Diane Valencia I am from the Southeast Asian Community Alliance with the coalition Central City United and we support the Just Hollywood Plan. I grew up and still have family in East Hollywood. I have seen so many neighbors move out, our rent has continually increased over the decade as so many luxury homes & hotels & airbnbs have dominated my neighborhood. We need more affordable housing for low income folks like my family & the remaining community members struggling to remain in the hood as it has been gentrifying & this plan update can further displace community folks like my family. With the pandemic, things have only gotten worse. Please support the Just Hollywood Plan, we don't need giveaways to hotel and luxury developers. We need housing especially at deep levels of affordability. NO to more hotel development and please stop upzoning without affordable housing requirements.

Thank You,

Diane Valencia

Youth Trainer

SouthEast Asian Community Alliance



Planning CPC <cpc@lacity.org>

DSPNA written comments on Hollywood Community Plan

Ellen Evans <dspna@dspna.org>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 11:37 AM

Our hillsides are an environmental and aesthetic resource for the Hollywood area and the City as a whole.

Thank you to staff for recognizing this and adding stronger open space protections to the Plan.

Out of scale development in the hills is a major factor in habitat destruction and loss of open space. The Plan goal of preventing out of scale development needs stronger implementation programs.

Applying two code changes to the hillsides - counting basement square footage towards allowable floor area and instituting an overall height limit - would be tremendously helpful in removing the incentive to build excessively-large buildings, which are largely investment properties and second homes and do not add to core housing stock in the City. In fact, we have observed a loss of real housing when these buildings are built.

Further, the significant grading that the current code allows and that would be reduced by the above modifications, ends up requiring much demand for concrete, which drives up costs for building in the City and presents significant environmental cost with little discernible benefit to the City.

Finally, further thought should be given to how to treat very large vacant lots that are privately held.

We appreciate all the hard work and outreach of the Planning team, and urge adoption with these additional code changes.

Best regards,
Ellen Evans
President
Doheny Sunset Plaza Neighborhood Association

--



**EAST HOLLYWOOD
NEIGHBORHOOD COUNCIL**

GOVERNING BOARD OFFICERS

Arasele Torrez, President
Ninoska Suarez, Vice President
Rogelio Pardo, Treasurer
Gesselly Marroquin, Recording Secretary
Jeff Zarrinam, Corresponding Treasurer
Faye Altobar, Corresponding Secretary

**CITY OF
LOS ANGELES
CALIFORNIA**



**ERIC GARCETTI
MAYOR**

**EAST HOLLYWOOD
NEIGHBORHOOD COUNCIL**

POSTAL MAIL
P.O Box 292359
Los Angeles California 90029

TELEPHONE
TBD

WEBSITE
www.easthollywood.net

Dear Ms Linda Lou,

We are writing to urge significant changes to the Hollywood Community Plan to protect tenants, encourage more sustainable transportation and ensure the creation of more needed affordable housing rather than luxury commercial or entirely market-rate housing development. The proposed Hollywood Community plan does nothing to address the crisis of displacement in the plan area, which lost 12,500 largely working class residents from 2000-2010. The plan as written undermines current incentives to build affordable housing while incentivizing luxury hotels over the creation of new housing.

Our neighborhood council supports the Just Hollywood Plan and specifically encourages the inclusion of the following provisions in the community plan:

1. Add New Community Plan Policies to the Plan from the South LA Plan to ensure decisionmakers to encourage local hiring and protect small businesses as laid out below:
 1. LU 6.1 Local Jobs. Maintain and increase the commercial employment base for community residents through local hiring requirements, living wage provisions, job resource centers and job training.
 2. LU 6.6: Avoid Displacement of Small Businesses. Encourage the retention of existing small businesses that strengthen the local economic base of the Community Plan Area.

2. Modify current provisions that make hotels by-right in certain areas per a special Q condition, and in Regional Center Areas and create a process that would stop the loss of our housing stock to hotels and encourage sustainable practices. Require a hotel conditional use permit, appealable to City Council that allows the City to consider measures taken by the project sponsor to encourage transit use and local hiring to reduce traffic demand and the impact of the project as well as on housing and small businesses per the criteria laid out below:
 - a. The impact of the project and future employees of the hotel or motel on the demand in the plan area for housing, public transit, child-care, and other social services.
 - b. The measures that will be taken by the project sponsor to employ residents of Hollywood in order to minimize increased demand for transportation
 - c. The measures that will be taken by the project sponsor, including a transportation demand management plan, to encourage hotel workers and visitors alike to use public transportation, cycling and other non-auto means of transportation.
 - d. The effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures by the project sponsor to increase demand

for local goods and services

The City shall also find:

f. The project will not negatively impact the housing affordable to Angelenos within the plan area, and at very least will replace all rent stabilized units with affordable units.

3. Ensure that upzoning is tied to affordable housing production. Modify the zoning changes in the East Hollywood Area on Santa Monica between the 101 freeway and Edgemore (Subareas 26, 44) to ensure that TOC affordability standards are reflected and ensure that hotels are clearly defined as a non-residential use. No increase in FAR from current standards.

4. Create planwide anti-displacement policies to protect rent-stabilized and affordable housing stock including:

- o An area-wide ban on condo conversions, tenancy in common conversions and conversions of RSO buildings to small lot subdivisions if vacancy rate is less than 5 percent or there is no accurate estimation of vacancy rate for the past year.
- o An annual cap on RSO demolitions with first priority going to projects that create a net increase in affordable units relative to RSO units demolished.
- o Require commercial projects that are on land where the Ellis Act has been invoked or where the project will demolish RSO housing or affordable housing to replace any units demolished with affordable units before the new certificate of occupancy is granted.
- o First priority for affordable housing should go to those displaced from the plan area.
- o Fix TOC and density bonus incentives so that there must be a significant net increase in affordable housing relative to existing rent stabilized housing in order to use the incentive. Require that all existing rent-stabilized units be replaced on a one to one basis with affordable units to access these incentives but do not count those number of units toward the required number of units to use the density bonus or TOC incentive.

5. Tie new commercial upzoning to special findings and programs including transit passes, set aside of land for bike lanes and/or truly publicly accessible open space, and requiring new buildings to be LEED Gold as laid out below:

- a. The project encourages the use of non-vehicular forms of transportation through a transportation demand management plan that includes at minimum subsidized transit passes, parking cash-out among mechanisms to ensure project employees use transit rather than cars to go to work.
- b. Development is likely to be focused on major boulevards designated in the plan as “Regional Center” or “Regional Commercial”. These are hubs of commercial activity and population. Projects should be required to designate land for bike paths- either fronting major streets like Hollywood and Sunset or where applicable streets with bicycle paths currently planned. This will over the long term create a designated bike path on major boulevards and supplement the existing bicycle infrastructure planned as part of the City’s Mobility Element. Required land dedications are a strategy that has been successfully used by several cities including Chapel Hill[1], to over time create a network of bike paths and greenways. A relatively small amount of dedicated land from each project can create a safer environment for cyclists and provide an important amenity for everyone.
- c. The project contributes to Los Angeles’s sorely neglected urban forest by incorporating trees in the development by preserving existing trees and adding drought-tolerant native street trees on site, in street medians, or on the sidewalk adjacent to their properties and embracing innovative design that include trees- for example “vertical forest” buildings.
- d. For new buildings energy use will be minimized to the greatest extent feasible, including but not limited to the building achieving LEED Gold certification at minimum and

no natural gas infrastructure (for example gas lines or gas stoves) for the project.

e. The project contributes to sorely needed open space through provision of a land dedication for parks, urban gardens, and other truly public green space rather than rooftops, public plazas and other spaces generally intended or limited to occupants or customers of the building.

f. The project is consistent with the goals and policies of the Community Plan.

Sincerely,

Ninoska Suarez
Vice President
East Hollywood Neighborhood Council



CPIO

Francesco <francescozimone12@gmail.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 8:58 PM

February 17, 2021

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is Francesco Zimone and I am a business tenant in Hollywood. It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges such as congestion and housing affordability while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong. As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan. Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood.

Respectfully,

Francesco Zimone
Branded Integrations and Hospitality Group
310.985.5985

FIX THE CITY

February 17, 2021

Email: CPC@lacity.org

FROM: FIX THE CITY (LAURA LAKE, PH.D.) Laura.Lake@gmail.com
TO: HON. SAMANTHA MILLMAN, CHAIR, LOS ANGELES CITY PLANNING COMMISSION
RE: **HOLLYWOOD COMMUNITY PLAN UPDATE: February 18, 2021**

Fix the City is a nonprofit organization that advocates for adequate public safety and infrastructure in Los Angeles.

COMPLY WITH JUDGE GOODMAN'S ORDER RE. HCP UPDATE

Under **General Plan Framework Mitigation Policy 3.3.2**, the City is obligated to balance infrastructure and public services when it makes a discretionary increase in density or intensity. Please verify that the plan before complies with the court order of Judge Allen Goodman regarding the last attempt at updating the HCP. The importance of balancing infrastructure and city services with discretionary increases in intensity or density is to not just provide public safety, but make Los Angeles a sustainable, healthy and safe city. Please review Judge Goodman's decision and remember, the City Attorney did not appeal his order. It is binding upon the CPC and City Council.

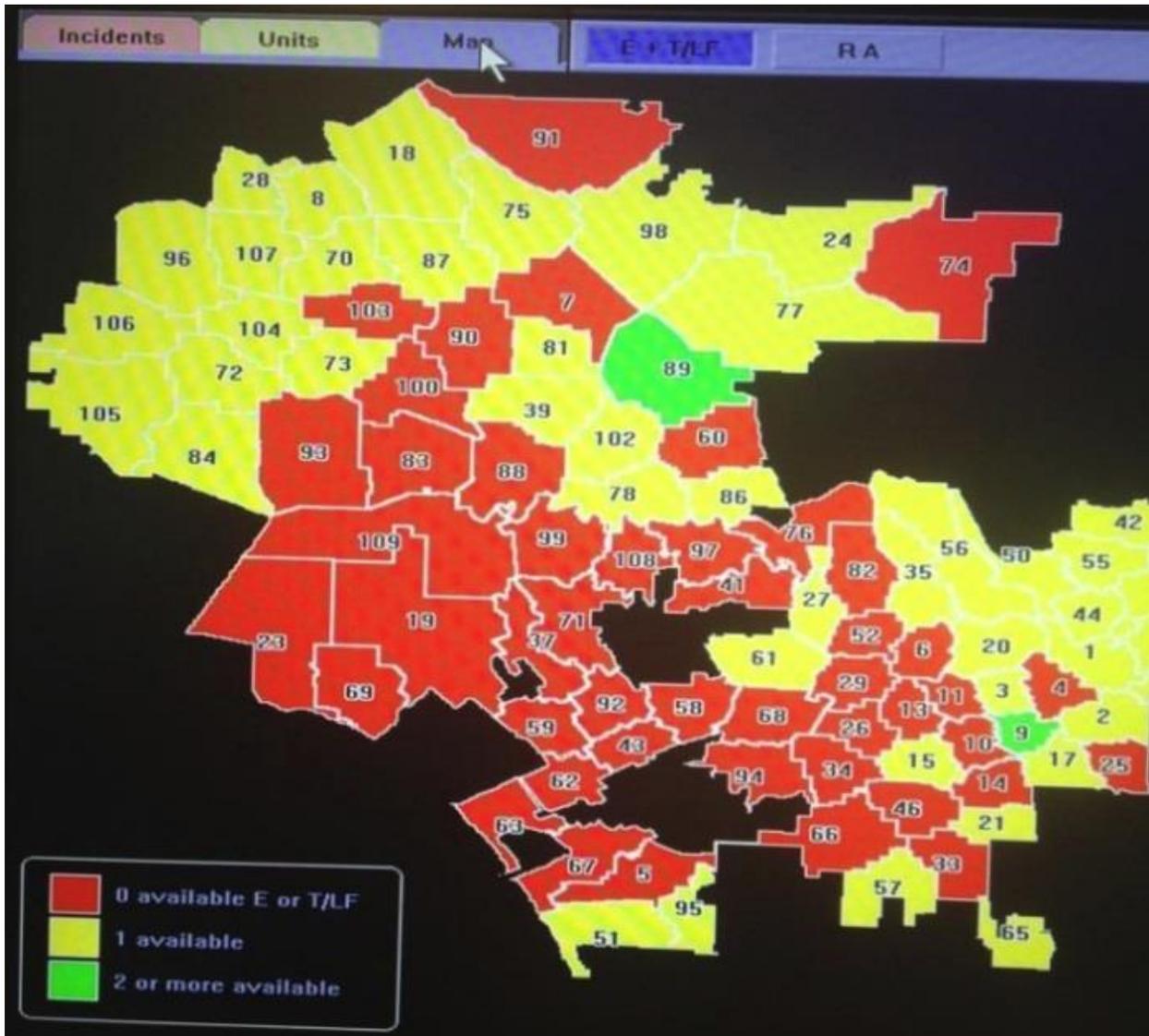
We have previously requested this analysis but want to make sure that it did not slip between the cracks. It is not just findings you must make, but they must be supported by substantial evidence. The challenge for the city is to show adequate infrastructure and city services for current and added demand. For example, in the analysis of LAFD adequacy the City must address not just the distance of fire stations in the community plan, it must show that these stations are in fact open and available to serve the community plan area.

Please note that as far back as 2012, most stations were already overburdened, as shown on the map below taken the LAFD Dispatch Center in 2012. The concern is that while a station may be on the map, it is not at all certain that the first-in station is available. It may be serving a distant community.

To make an accurate assessment of adequacy of fire protection and EMS service, it is necessary, therefore, to determine the frequency with which local stations are diverted to distant communities, and the response times for all calls, not just published response times for the first-in stations.

Fix the City incorporates by reference the 26,000 pages of substantial evidence on infrastructure and city service inadequacy that were submitted for the Expo TNP.

FIX THE CITY



COMPLY WITH MEASURE JJJ SECTION 4

Under Measure JJJ Section 4, General Plan review must include an analysis of the impacts on affordable housing and provide an inventory and monitoring system to protect existing affordable housing. Has this analysis been conducted? Where is it available to the public? The actual language of JJJ is as follows:

Measure JJJ, Sec. 4. Requirement for Plan Updates and Consistency.

“Section 11.5.8 of Article 1.5 of the Los Angeles Municipal Code is amended to read as follows:

SEC. 11.5.8. GENERAL PLAN REVIEW.

FIX THE CITY

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

1. Reduce the capacity for creation and preservation of affordable housing and access to local jobs; or
2. Undermine California Government Code Section 65915 or any other affordable housing incentive program; and the changes must include a program to create and monitor an inventory of units within the Community Plan Area that are: subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households.

B. Action on Proposed Amendments. The City Planning Commission shall receive the assessment by the Planning Department and shall by vote make a recommendation to accept or reject the amendment. The Commission's recommendation will be received by City Council and the Council shall vote to 8 either accept or reject the proposed amendment. The current plans for the 37 planning areas shall remain in full force and effect until or unless the City Council votes to amend them in accordance with this section."



Public Comment 2/18/21

Gina Viola <gina@tradeshowtemps.net>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 8:41 AM

Hollywood is awash in luxury commercial development while thousands have been displaced. The Hollywood Community Plan Update, which will be considered by City Planning Commission on Thursday, February 18th will decide the future of development in Hollywood for decades to come. Unfortunately the plan is a giveaway that will allow larger luxury commercial developments and allows luxury commercial projects like hotels to use plan bonuses rather than provides for the housing we need.

Please stand with leaders from faith, environmental, labor, and community organizations in supporting the Just Hollywood Plan!

Gina Viola ([she/her/hers](#))



Corporate Address:
[445 S. Figueroa St. Suite 3100](#)
[Los Angeles, CA 90071](#)
Phone: 888.748.3677
Fax: 213.438.0410
<http://www.tradeshowtemps.net>

The information contained in this message may be privileged and confidential and thus protected from disclosure. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer. Thank you, Trade Show Temps.



Gonzales Law Group, APC

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Telephone: 213.279.6965 | Fax: 213.402.2638
www.gonzaleslawgroup.com

Michael Gonzales

E-mail: mgonzales@gonzaleslawgroup.com

February 17, 2021

VIA EMAIL ONLY

Los Angeles City Planning Commission
Los Angeles City Hall
200 N. Spring Street Room 272
Los Angeles, CA 90012
Cpc@lacity.org
Attn: Cecilia Lamas, Commission Executive Assistant

RE: CPC-2016-1450-CPU; ENV-2016-1451-EIR

Dear Commissioners:

This firm represents Sunset and Gardner Investors, LLC (“SGI”), the owner of those certain parcels of real property commonly referred to as 7441 to 7449 Sunset Boulevard and 1502 to 1516 Gardner Avenue, and also identified as Assessor’s Parcel Numbers 5550-013-001, 014, 015, 019, 020, 021 and 022 (the “Property”). The Property is located in the transit rich Hollywood community of the City of Los Angeles (“City”). The Property is currently improved with multiple two-story commercial structures, two off-site advertising static billboards and a surface parking lot. The Property is ripe for future redevelopment.

The Property is subject to the Hollywood Community Plan Update (the “Update”) that is before you on February 18, 2021. SGI and we recognize Los Angeles Department of City Planning (“LADCP”) Staff’s hard work at crafting an Update that will guide Hollywood’s development for the foreseeable future. For this reason, it is imperative that the Update reflect the community’s current and future needs, incentivizing development that will house Angelenos for the coming generations.

As you know, in 2012 a prior update to the Hollywood Community Plan was adopted but was later rescinded due to litigation. The prior update did not propose to change the Property’s zoning or development potential. Since that time, the City has also adopted the Transit Oriented Communities (“TOC”) program to incentive the production of affordable housing. The Property is zoned C4-1D and is in TOC Tier 1, which would allow a floor area ratio (“FAR”) of up to 2.75 to 1. The Property’s zoning designation does not currently impose a vertical height limitation.

The Update does not change the Property's zone, but it will subject the Property to the development regulations set forth in the proposed Community Plan Implementation Overlay ("CPIO"), which is also before you on February 18, 2021.

The CPIO designates the Property as Corridor 5, which imposes a base FAR of 1 to 1 and a maximum height of 30 feet. Again, the previously adopted and rescinded community plan did not impose any restrictions on the Property. Projects that include a specified percentage of affordable housing are allowed a bonus FAR of 2 to 1. The CPIO, however, does not allow any additional height in the Corridor 5 designation, rendering the bonus FAR essentially useless. Constructing anywhere near the CPIO's permitted density is physically impossible with a 30 foot height restriction. Including a commercial ground floor (on a major corridor nonetheless) is also complicated by the height restriction. The CPIO does not explain why the Property is subject to a height restriction. Adjacent properties immediately to the east and south (designated Corridor 2 by the CPIO) are allowed a bonus FAR of 3 to 1 and a bonus height of up to 67 feet. Like the Property, these sites are located adjacent to higher density multi-family developments in the R3 zone. Many of the other commercial sites designated Corridor 5 are located adjacent to an established single family neighborhood, much of which is designated as an Historic Preservation Overlay Zone ("HPOZ"). While not conceding that the CPIO's rigid height restriction is appropriate on any portion of Sunset Boulevard, adjacency to the HPOZ does give some defensible justification. Imposing the same rigid height restriction on the Property is not similarly justifiable. We urge this Commission to extend the Corridor 2 designation across Vista Street to include the Property to allow efficient and optimal utilization of the underlying residential density. Without additional FAR and height, residential density and affordable housing units will go undeveloped. In our current housing crises, opportunity sites like the Property cannot be effectively down-zoned.

SGI would also urge this Commission to vest projects that have filed complete applications with LADCP prior to the CPIO's effective date. The predevelopment process is a costly effort and projects that that have filed before the CPIO's effective date must be protected. We are many months away from the Update and CPIO adoption, without vesting protections for projects already in process, development in Hollywood could slow down leading to less, not more, housing development. We therefore urge this Commission to include vesting language in the CPIO.

Very truly yours,



Michael Gonzales
Gonzales Law Group APC



Planning CPC <cpc@lacity.org>

City Planning Case: CPC-2016-1450-CPU

hm.eigenberg@gmail.com <hm.eigenberg@gmail.com>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 6:57 AM

Good Day

As a resident of CD4

Please stop all the give aways to developers by requiring affordable units in every new building. We need everyone to take responsibility to end our housing crisis! We need AFFORDABLE HOUSING NOT LUXURY now!

Sincerely

Helen eigenberg
611 Lillian Way
90004

Sent from my iPhone



February 17, 2021

Los Angeles City Planning Commission
200 N. Spring Street
Los Angeles, California 90012

Re: Hollywood Community Plan Update - CPC-2016-1450-CPU

Dear Commissioners,

On behalf of the Hollywood Chamber of Commerce and over 800 of our member organizations who employ over 115,000 individuals, we would like to convey our opposition for select amendments presented by the Department of City Planning. We would like to thank the Department of City Planning for their hard work and inclusion of numerous amendments which would clarify uncertain language, provide additional benefits for housing development, and alleviate parking requirements. **However, we are incredibly disappointed in the recommendation to lower base FAR from 4.5:1 to 3:1 in the Regional Center and we ask the Planning Commission to reinstate the original higher density as proposed in the August draft by the Department of City Planning.**

Hollywood is an economic driver for our region, which creates thousands of jobs for Angelenos. The Hollywood Community Plan will affect hundreds of thousands of people and needs to reflect the needs of all stakeholders. Understanding that this change was made in response to public comments in a previous public hearing, we would ask the Planning Commission to consider the diverse stakeholders in Hollywood and the long-term growth needed to address our homelessness and housing crisis. This includes maximizing housing growth, which can only be accomplished through increased density.

We were incredibly disappointed to see the change in the base FAR for the regional centers. This directly undermines the ability to build additional housing, including affordable housing, because the lower density does not make it feasible for developers to build projects. This change does not accommodate future growth for an economically thriving community like Hollywood. Our Chamber understands the Department must listen to community feedback, but it is incredibly difficult for the business community to appear in mass numbers during public meetings while in a pandemic when they are desperately trying to keep people employed and their businesses open. These changes were requested by activists that do not represent the diverse stakeholders in Hollywood and we respectfully ask that you reinstate the originally proposed base FAR at 4.5:1.

Together we must strive to accommodate expected growth, preserve neighborhoods, provide employment opportunities throughout all industries, creatively protect historic resources, and encourage a variety of transportation options to our community members and visitors. Thank you for your attention to this matter and for your leadership on the Hollywood Community Plan Update and CPIO. If you have any questions, please contact Diana Yedoyan, Vice President of Public Policy and Economic Development via email at diana@hollywoodchamber.net or via phone at (323)468-1380 ext 140.

Sincerely,

Rana Ghadban
President & CEO



February 16, 2021

Re: Hollywood Plan - CPC-2016-1450-CPU & ENV-2016-1451-EIR

Dear City Planning Commission:

On review of the Hollywood Community Plan, we believe that, with the increase in homelessness in the City of Los Angeles, and the continuing plight of residents who are rent-burdened and face displacement, we recommend the following amendments to the Hollywood Community Plan:

1. Homelessness: Government property and government owned vacant lots within the plan area should be utilized for 100% homeless housing.
2. Tenants: Require a plan to address displacement from development that includes a tenant's difference in rent paid by the developer during the time of construction with a right of return to a comparable unit. In the case of an RSO or affordable unit, the unit will also be RSO or affordable at return at the same rental rate as prior to demolition.
3. Affordable Housing Requirements: New or rehabilitated dwelling units within the plan area will have thirty-five percent (35%) inclusionary housing for persons and families of low or moderate income; and of such thirty percent, not less than fifty percent (50%) shall be for Very Low-Income and Extremely Low-Income households. The percentage requirements set forth in this Section shall apply in the aggregate to housing in the Plan Area, either by individual case of rehabilitation, development or construction of dwelling units in individual developments, or 100% affordable housing structures.
4. Designated historic preservationists will have approval in the plan-check processes through Building and Safety. Appeals of demolition permits will also be heard by the preservationists. A formal HPOZ in Hollywood will be submitted prior to the approval of the Plan proposal and EIR.

Warm Regards,

Susie Shannon
Policy Director, HHR
(213) 880-3065

Susan Hunter
Housing Justice Organizer
(949) 295-0206



Planning CPC <cpc@lacity.org>

Case Number CPC-2016-1450-CPU

Johnny 99 <exposureusa@yahoo.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 4:12 PM

February 17, 2021

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is John Arakaki, I am a minority member of the community as well as a small business owner in Hollywood. It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges such as congestion and housing affordability while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong. As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan. Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood.

Respectfully,

John Arakaki
aka Johnny 99
Managing Partner of the Libertine Group
SAINT FELIX HOLLYWOOD - 1602 Cahuenga Blvd. - Los Angeles, CA 90028

THE POWDER ROOM - 1606 Cahuenga Blvd. - Los Angeles, CA 90028
<http://powderroomla.net>

SAINT FELIX WeHo - 8945 Santa Monica Blvd. - West Hollywood, CA 90069
<http://saintfelix.net>

<http://www.facebook.com/johnny99><https://twitter.com/johnny99>



CPIO/HCPU

Jenifer Barkon <jbarkon@hotmail.com>

Wed, Feb 17, 2021 at 10:03 PM

To: "cpc@lacity.org" <cpc@lacity.org>, "linda.lou@lacity.org" <linda.lou@lacity.org>

To whom it may concern,

I am writing to express my support of the current proposed zoning in the CPIO draft, pages 48-62, i.e., Sunset Blvd. from Fairfax to Vista. Specifically:

- Protection of a public elementary school that was previously threatened by inappropriate zoning
- Avoidance of a narrow, 1 lot deep frontage with zero parking or separation from the nearby homes
- The appropriate nature of current height designation for 3 story residential
- Preservation of the commercial corner and of residential neighborhood friendly commercial
- Protection of two 100+ year old HPOZ neighborhoods which directly abut these 10 blocks

Please register my support of the current proposed zoning and take the appropriate action to represent the community and your constituents.

Sincerely,

Jenifer Barkon

[1540 N. Sierra Bonita Ave.](#)

LA, CA 90046



Planning CPC <cpc@lacity.org>

City Planning Case: CPC-2016-1450-CPU

Janna Harris <jannabodekharris@icloud.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 11:13 PM

Hello,

Please stop all the give aways to developers by requiring affordable units in every new building. We need everyone to take responsibility to end our housing crisis! We need AFFORDABLE HOUSING NOT LUXURY now!

Janna Bodek Harris
CD4



Planning CPC <cpc@lacity.org>

Hollywood Community Plan Update Revision

Jack Illes <jack@urban-california.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Feb 17, 2021 at 9:14 AM

Dear Hollywood Community Plan,

I am writing to show my support for the Hollywood Community Plan. This document is critical for the future development and economic prosperity of the Hollywood region. This region has seen a tremendous increase in jobs and business growth for some time now and must be treated as a critical economic driver for the City of Los Angeles.

After the last public hearing, certain amendments have been made but there are still many that were not incorporated within this new draft. Thank you to the Planning Department and Planning Commissioners for listening to the public and incorporating some of our changes.

The most critical change this time around was the reduction of base FAR from 4.5:1 to 3:1. Our community is in the midst of a housing and economic crisis. Now is the time to make bold decisions and create opportunities for higher density which will lead to increased housing units and commercial square footage. We ask that you do not approve this change and revert back to the original proposal of 4.5:1 base FAR. It is important to make decisions which will lead to increased economic development in Hollywood.

Thank you.

Sincerely,
Jack Illes
jack@smart-citylabs.com

Smart City Labs

[3919 W 8TH ST, Suite 5](#)
Los Angeles, CA 90005-3433
Constituent

Jack Illes

Smart City Labs

Urban Strategies

619 540 3286

<https://about.me/JackIlles>

Check out the new website: www.smart-citylabs.com



Planning CPC <cpc@lacity.org>

Fw: Hollywood needs your help asap

Jose Malagon <jose.malagon@pacbell.net>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Feb 17, 2021 at 1:24 PM

February 17, 2021

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is Jose Malagon, and I am a property and business owner in Hollywood in Hollywood. It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges such as congestion and housing affordability while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong. As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan. Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood.

Respectfully,

Jose Malagon

February 17, 2021

RE: CPC-2016-1450-CPU

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is Joe Rehfeld and I am a property owner and business owner in Hollywood. It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges - congestion and housing affordability - while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

Hollywood has faced many difficulties over the years and especially this past year during the pandemic. We have seen more and more people struggle with housing while at the same time businesses have found it difficult to stay alive and have been reluctant to return given the ups and downs of the pandemic. While the pandemic may be a short-term problem, the long-term issues for Hollywood remain and need to be addressed so this community can be a place for all to thrive.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong.

As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan. Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood. Doing this will allow for more affordable housing and the density we need to be strong.

Sincerely,



Joe Rehfeld
6250 Hollywood Blvd
Los Angeles CA 90028
josephrehfeld@gmail.com



Planning CPC <cpc@lacity.org>

Hollywood Community Plan

John Walker <John@walkerrealestateadvisors.com>

Wed, Feb 17, 2021 at 11:22 AM

To: "cpc@lacity.org" <cpc@lacity.org>

Cc: John Walker <John@walkerrealestateadvisors.com>, "John Walker - SCL (john.walker@smart-citylabs.com)" <john.walker@smart-citylabs.com>

Dear Hollywood Community Plan,

I am writing to show my support for the Hollywood Community Plan. This document is critical for the future development and economic prosperity of the Hollywood region. This region has seen a tremendous increase in jobs and business growth for some time now and must be treated as a critical economic driver for the City of Los Angeles.

After the last public hearing, certain amendments have been made but there are still many that were not incorporated within this new draft. Thank you to the Planning Department and Planning Commissioners for listening to the public and incorporating some of our changes.

The most critical change this time around was the reduction of base FAR from 4.5:1 to 3:1. Our community is in the midst of a housing and economic crisis. Now is the time to make bold decisions and create opportunities for higher density which will lead to increased housing units and commercial square footage. We ask that you do not approve this change and revert back to the original proposal of 4.5:1 base FAR. It is important to make decisions which will lead to increased economic development in Hollywood.

Thank you.

Sincerely,

John Walker

john@smart-citylabs.com

(760) 822-4619

Smart City Labs

[3919 W 8TH ST, Suite 5](#)
Los Angeles, CA 90005-3433
Constituent

John E. Walker
Asset Management

Smart-City Labs

760) 822-4619

John.walker@smart-citylabs.com

<https://smart-citylabs.com/>



February 17, 2021

Honorable Members of the City Planning Commission,

On behalf of the Just Hollywood Coalition of housing, community, environmental and labor organizations, we urge you to adopt the [Just Hollywood Plan](#). Hollywood's current development boom is a microcosm of the unsustainable environmental and economic trends in Los Angeles and across our country that mean riches for the few and crisis for the many. Since 2000, a luxury commercial development boom has doubled the number of hotel rooms in Hollywood with the number of hotel rooms set to double again if all projects in the pipeline are built. Commercial office space is also set to double. At the same time, Hollywood's working class is being pushed out of Hollywood. Driven out by increased rents, Hollywood's population dropped by 12,500 between 2000-2010.¹ In the face of the development boom, the Latino population dropped by 17 percent between 2000-2010, believed to be the largest mass departure from an LA neighborhood in decades.² Unfortunately, the proposed Hollywood Plan does not meet the challenge of the moment. The plan is still a giveaway to commercial developers, allowing more luxury commercial development at the expense of the affordable housing desperately needed, doing little to address displacement or our climate crisis.

On the contrary, our Just Hollywood Plan builds upon current housing incentives, ensures upzoning is focused on housing rather than luxury commercial development, promotes sustainability and will help stop the wave of displacement hitting Hollywood. We urge the following:

1. **Community Control Over Hotel Development Via Hotel CUP.** A hotel CUP appealable to Council that will consider measures taken by the project sponsor to encourage transit use and local hiring to reduce traffic demand. The CUP should also require an analysis of the impact of the project on housing and small businesses. The CUP should explicitly ban the conversion of RSO apartments to hotels or at minimum require replacement with affordable units.
2. **No Developer Giveaways: Upzone for Housing with Affordability, Not Luxury Hotels and Commercial Uses.**
 - a. Do not increase base zoning rights, which allow commercial development to crowd out housing. Remove the increase in Base FAR from 2 to 3 in several plan subareas (e.g., 4:1C, 4:2C, 4:4, 4:4A, 4:5D, 4:5L, 6:1, parts of 4:1B, 4:1F, 4:1G, 4:5 and 4:5B). By increasing the Base FAR, we undermine the incentive to construct housing through utilizing the density bonus (which allows an increase to 3 in exchange for an affordable housing set aside) or CPIO affordable housing programs, since applicants are effectively granted these rights for free. This violates Measure JJJ, which explicitly states that community plan changes cannot undermine California Government Code § 65915 (the density bonus program) or any other affordable housing incentive program. All projects seeking increased density should be required to utilize affordable housing incentive programs. The

¹ See Community Plan Area Demographic Profile 2010-2014, https://planning.lacity.org/complan/CPA_DemographicProfile/2014_HOLLYWOOD.pdf; 1990 and 2000, <http://www.fixthecity.org/docs/HCPU/Decision.pdf>.

² <https://www.laweekly.com/news/hollywoods-urban-cleansing-2612554>.

Plan must ensure that **all** upzoning and land use incentives are aligned with on-site affordable housing standards that meet or exceed the standards in Measure JJJ and the TOC Program.

- b. Special focus should go to incentivizing extremely and deeply low-income housing in order to provide housing for low-wage workers and the region's transit dependent population, especially given the transit-rich nature of the plan area.
 - c. Hotels should not be allowed in projects using CPIO Affordable Housing, open space, or other bonuses.
3. **Sustainability.** Require all commercial projects and projects seeking discretionary FAR increases to provide a minimum level of sustainability measures.
- a. Hollywood borders one of the largest urban parks in the country, so its plan should require strong sustainability measures and green design that integrates the urban landscape and open space. Require native trees and shrubs in landscaping, which are naturally drought and fire resistant because they evolved for this climate. Require the planting of a minimum number of trees and shrubs in each project.
 - b. Require at least require LEED Gold certification and no natural gas infrastructure in project.
 - c. Encourage transit uses by providing at minimum free transit passes to employees.
4. **Anti-Displacement Measures.**
- a. In order to use CPIO or TOC bonus incentives, projects that displace existing rent-controlled buildings should be required to build the requisite amount of affordable housing *in addition to* their replacement requirement.
 - b. An annual cap on demolitions of RSO housing in the plan area. A ban on conversion of RSO apartments to condos or small lot subdivisions when the vacancy rate is under five percent or no updated vacancy rate is available.
 - c. Incorporate the anti-displacement policy suggestions made by Central City United Coalition for the Downtown Community Plan in order to align measures being considered in multiple plans that are being updated.³

Thank you very much for the opportunity to comment on the plan. For a longer version of our policy document, please see <https://tinyurl.com/justhollywoodlettertoplanning>.

Regards,
The Just Hollywood Coalition



³ <https://static1.squarespace.com/static/5e2f9c1251bedc373bccf0fa/t/5e335a0b78d5f55da090bca5/1580423692912/CCU+Proposed+Amendments+to+July+2019+Draft+DTLA+Community+Plan+Policy+Text.pdf>



Planning CPC <cpc@lacity.org>

City Planning Case: CPC-2016-1450-CPU

Katy Kincade <kkincade2@gmail.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 3:24 PM

It is so important that you include a substantial number of affordable units in the planning for Hollywood. The homeless situation is terrible for everyone, and the city needs so many more affordable units to reverse the net loss of people moving out of the city. Making the city more livable for all benefits all- including developers. Do the right thing on Thursday and the months ahead!

Sincerely,
Katy Kincade
[3243 Portola Ave, Apt.3](#)
[Los Angeles, CA 90032](#)



Planning CPC <cpc@lacity.org>

CPC-2016-1450-CPU; ENV-2016-1451-EIR

Kathleen Larsen <kalertfin@yahoo.com>
To: Planning CPC <cpc@lacity.org>

Wed, Feb 17, 2021 at 5:22 PM

This "plan" for the Hollywood Community needs to be put in a shredder.

It is an sad anachronism built on wishful thinking and envy of the City of New York. Have the courage to terminate such nonsense.

Sincerely,

Kathleen Larsen
PO Box 74458
Los Angeles, CA 90004
kalertfin@yahoo.com



February 17, 2021

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is Errol Roussel, and I am a restaurant owner in Hollywood.

It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges such as congestion and housing affordability while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong. As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan. Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood.

Respectfully,

Errol Roussel
Kitchen24

Klein Financial Corporation

February 17, 2021

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is Chad Lewis, and I am the owner's representative for 1600 Vine Apartments in Hollywood. It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges such as congestion and housing affordability while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong. As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan.

Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood.

Respectfully,



Chad Lewis
SVP of Development
Klein Financial Corporation



Planning CPC <cpc@lacity.org>

CPIO/HCPU

LC <frelapub@yahoo.com>

Thu, Feb 18, 2021 at 3:24 AM

To: "cpc@lacity.org" <cpc@lacity.org>, "linda.lou@lacity.org" <linda.lou@lacity.org>

I support and want the proposed CPIO draft to remain as is [CPIO draft, pages 48-62, i.e., sunset blvd from fairfax east to vista].

Our HPOZ protects our neighborhood. We are an historic neighborhood, as is Spaulding Square, to the south. There is so little history, left, and so few genuine neighborhoods. Please don't take that away.

Lara Cody Curci
[1533 N. Orange Grove Ave.](#)



CPC Zoning 830am meeting

lisa koers <lisakoers@yahoo.com>

Thu, Feb 18, 2021 at 6:46 AM

To: cpc@lacity.org, linda.lou@lacity.org, nithya.raman@lacity.org, meg.healy@lacity.org, rachel.fox@lacity.org, tabatha.yelos@lacity.org, jesse.zwick@lacity.org

To whom it may concern:

I am completely disappointed and disgusted by Nithya's last minute letter opposing proposed zoning on the residential/hpoz part of Sunset Blvd, from Fairfax east to vista.

Sunset Square HPOZ has toiled for years working on appropriate zoning for this sensitive part of Sunset Blvd- zoning which is suitable and required for our residential community.

This HPOZ has very specific reasons for asking for, and being given, the current proposed zoning in the CPIO draft, pages 48-62, i.e., sunset blvd from fairfax east to vista, not the least of which is:

- a public elementary school that was previously threatened by inappropriate zoning*
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes,*
- The complete appropriateness of current height designation for 3 story residential*
- The complete appropriateness of preserving the commercial corner,*
- The complete appropriateness of neighborhood friendly commercial*
- And last, but certainly not least, TWO 100+ year old HPOZ neighborhoods which directly abut these 10 blocks.*

Do you have any knowledge WHATSOEVER about our area?

Do you know WHY the HCPU planners granted us the zoning in the current draft?

Is the reason for your letter in opposition based on ignorance or betrayal?

You promised during your campaign to honor and protect our HPOZ's. What happened to this commitment?????????

The current CPIO draft, an excellent and well-thought out draft, does exactly what YOU promised.

I cant even begin to express how damaging your letter letter in opposition is to YOUR constituents.

You didn't even reach out to us before sending that inappropriate, ill thought-out, ignorance-betraying letter. Seriously, how dare you? These are OUR NEIGHBORHOODS and we are YOUR constituents. Please start representing our needs and interests.

Residents and stakeholders of this community DEMAND you withdraw this opposition.

*Thank you
Lisa Koers*



A Non-Profit Organization Dedicated to Preserving Open Space in Laurel Canyon

February 17, 2020

VIA EMAIL: cpc@lacity.org

City Planning Commission
200 N. Spring Street
Los Angeles, California 90012

**Re: Comments on the Hollywood Community Plan Update, City EIR
No. ENV-2016-1451- EIR, CPC-2016-1450-CPU, State Clearinghouse
No. 2016041093**

Dear City Planning Commission:

I am writing on behalf of the Laurel Canyon Land Trust (LCLT), a non-profit organization established for the purpose of conserving undeveloped land in Laurel Canyon, California. The mission of the Laurel Canyon Land Trust is to both preserve land for the enjoyment and education of residents and to provide habitat for the wildlife of the Santa Monica Mountains.

The Hollywood Community Plan Update (“HCP”) provides the following policy:

- Policy “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.

This is laudable goal which LCLT fully supports. However, the HCP should include Implementation Programs to address this objective. LCLT recommends the following:

1. Re-Zone City-Owned Vacant Land to “Open Space” in Santa Monica Mountains. Believe it or not, the City actually owns quite a few parcels in the Hollywood Hills, including Laurel Canyon. Many of these parcels contain mature native trees which sequester carbon and provide habitat

*Tel: 310-709-9600
Email: jamie@lclandtrust.org*

for rare and threatened species such as the local Mountain Lion population which was recently designated as a candidate species by the California Department of Fish and Wildlife under the California Endangered Species Act. These parcels are not amenable to development as they are located on steep hillsides and would require extensive, costly infrastructure to develop (plus they are located in a Very High Fire Hazard Severity Zone).

2. Update Draft Map to Include All Land Acquired by Santa Monica Mountains Conservancy/Mountains Recreation and Conservation Authority. The Draft Map fails to include all land recently acquired by the Conservancy. This must be the result of utilizing old data. It is really important to rezone all these SMMC/MRCA parcels to open space. Over the years LCLT has worked in partnership with the Conservancy to buy land in Laurel Canyon (including the 17 Acre Let's Buy a Mountain property right in the heart of Laurel Canyon.) See www.letsbuyamountain.com.
3. Re-Zone Land Acquired by LCLT to Open Space. LCLT is pleased that the City has agreed to rezone the land acquired by LCLT to "open-space." We would ask that the following parcels acquired in December 2020 be included in the proposed rezoning to open space: APNs 5567-018-050, 5567-018-039 and 5567-018-040.
4. Designate Certain Parcels in Community Plan as "Desirable Open Space." Such a notation could at least provide the City with a roadmap for future acquisition and preservation. One such parcel in Laurel Canyon is located off of Laurel Canyon Boulevard (a locally designated scenic highway). It is an 11.9 acre parcel that is home to a Walnut Woodland (APN 5567-029-032). This is one of the largest single undeveloped parcels in Laurel Canyon and a prime candidate for open space preservation. Other parcels should be considered and LCLT would be happy to provide a more comprehensive list to the City for review.

Finally, LCLT suggests that a streamlined mechanism for rezoning land acquired for open space preservation be adopted by the City

I may be contacted at (323) 709-9600 or at jamie@lclandtrust.org if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall
Laurel Canyon Land Trust
President



Hollywood Community Plan Update Community Impact Statement

josh.steichmann@lofeliznc.org <josh.steichmann@lofeliznc.org>
To: cpc@lacity.org
Cc: Jon Deutsch <jon.deutsch@lofeliznc.org>, derek.galey@lofeliznc.org

Thu, Feb 18, 2021 at 12:51 AM

Dear CPC,

On behalf of the Los Feliz Neighborhood Council, I am submitting our community impact statement as public comment on the Hollywood Community Plan Update. I have attached the file as a PDF. I have pasted a plain-text copy below.

Thank you,

Josh Steichmann

--
Los Feliz Neighborhood Council District E representative

Title: Hollywood Community Plan Update (HCPU2) Position: Not in Support

Case No.: CPC-2016-1450-CPU

We appreciate changes made in the latest draft of the Hollywood Community Plan, notably inclusion of affordability bonuses, goals on living-wage jobs and local hiring, and hotel zoning in certain multifamily areas, but the Los Feliz Neighborhood Council cannot support the Plan as currently drafted due to its failure to plan for a sustainable, affordable, equitable and livable Los Feliz.

The plan needs significant changes to address historical and systemic planning failures that discriminate on race and class; to protect tenants; to support sustainable transportation and development; and to ensure affordable housing. Otherwise, the plan will perpetuate inequitable development and wealth distribution in the Hollywood Community.

In 1989, the Los Feliz Design Report noted the inadequacy of the existing Plan, adopted in 1988. The Planning Department has not updated the Los Feliz Design Report or prepared subsequent analysis, specifically of historical patterns of growth and exclusion, as well as the future needs as we deal with the challenges of homelessness, climate change and racial equity.

The Los Feliz of 1989 is not the Los Feliz of 2020, nor should 1989 be the future of Los Feliz.

The current draft also retains existing single-family residential zoning area, with roughly 30 percent of total area reserved for single-family use. By retaining downzoning from 1974 and 1986 that capped housing stock, the Plan undermines the historic character of the neighborhood, seen in the popularity of bungalow, courtyard-style, and other multi-family developments from 1920s and 1930s.

Maintaining these rent-stabilized units while expanding the affordable, multifamily housing supply is a priority for the Los Feliz Neighborhood Council. Promoting the development of affordable, multifamily housing by reducing single-family zoning — not single-family homes — in Los Feliz would remove one barrier to these and other models consistent with neighborhood character and existing homes. It would also help remediate the continuing legacies of exclusion and inequity that stem from redlining and racially restrictive covenants in Los Feliz, which current zoning helps perpetuate.

The Plan Update should also decrease parking minimums and adopt parking maximums, to reduce barriers to housing construction, fight climate change, and further the goals of the Transit Oriented Community program.

These changes are in line with Los Feliz's existing mixed-density, mixed-income neighborhoods, in which a variety of housing typologies built without much parking contribute to a diverse and thriving community. Proximity to existing and planned transit service also justifies increased density in Los Feliz.

Our neighborhood council also supports the Just Hollywood Coalition's Plan overall recommendations and specifically endorse their provisions regarding affordable housing FAR; sustainability requirements for zoning FAR changes; defining hotels as commercial use; rubric for applying and evaluating hotel CUPs; fix the TOC/CPIO affordable housing program;

additional anti-displacement measures; transfer of development rights; allowing by-right affordable housing in multi-family areas.



LosFelizNeighborhoodCouncilHollywoodPlanUodate.pdf

494K



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VICE PRESIDENT
Celine Vacher - Communications

PRESIDENT
Jon Deutsch

VICE PRESIDENT
Dan McNamara - Administration

SECRETARY
Misty LeGrande

Title: Hollywood Community Plan Update (HCPU2) Position: Not in Support

Case No.: CPC-2016-1450-CPU

We appreciate changes made in the latest draft of the Hollywood Community Plan, notably inclusion of affordability bonuses, goals on living-wage jobs and local hiring, and hotel zoning in certain multifamily areas, but the Los Feliz Neighborhood Council cannot support the Plan as currently drafted due to its failure to plan for a sustainable, affordable, equitable and livable Los Feliz.

The plan needs significant changes to address historical and systemic planning failures that discriminate on race and class; to protect tenants; to support sustainable transportation and development; and to ensure affordable housing. Otherwise, the plan will perpetuate inequitable development and wealth distribution in the Hollywood Community.

In 1989, the Los Feliz Design Report noted the inadequacy of the existing Plan, adopted in 1988. The Planning Department has not updated the Los Feliz Design Report or prepared subsequent analysis, specifically of historical patterns of growth and exclusion, as well as the future needs as we deal with the challenges of homelessness, climate change and racial equity.

The Los Feliz of 1989 is not the Los Feliz of 2020, nor should 1989 be the future of Los Feliz. The current draft also retains existing single-family residential zoning area, with roughly 30 percent of total area reserved for single-family use. By retaining downzoning from 1974 and 1986 that capped housing stock, the Plan undermines the historic character of the

neighborhood, seen in the popularity of bungalow, courtyard-style, and other multi-family developments from 1920s and 1930s.

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Our neighborhood council also supports the Just Hollywood Coalition's Plan overall recommendations and specifically endorse their provisions regarding affordable housing FAR; sustainability requirements for zoning FAR changes; defining hotels as commercial use; rubric for applying and evaluating hotel CUPs; fix the TOC/CPIO affordable housing program; additional anti-displacement measures; transfer of development rights; allowing by-right affordable housing in multi-family areas.

February 17, 2021

Dear Honorable Members of the Los Angeles City Planning Commission,

I am writing to you today in regards to Case Number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update and Community Plan Implementation Overlay (CPIO). My family and I are longtime property owners in Hollywood and are invested in the continued growth of a community we love.

As Hollywood continues to evolve and grow, it is critical that Hollywood has an updated community plan to provide stakeholders and decision-makers with clear guidance on how our neighborhood can evolve in a sustainable way. In the midst of a historic housing crisis, we absolutely need to build more housing and we can do so in a way that creates a more vibrant and economically thriving local economy.

The proposal before you today does a good job with certain process-related improvements and these will help bring certainty to current and future stakeholders, investors and projects. However, the reduction in FAR is extremely problematic. Hollywood cannot continue to grow at a pace that will keep up with population demands or even some of the goals articulated in the plan if the FAR level remains where it is currently contemplated.

Although staff has done a good job throughout this difficult process, I respectfully request that this Commission increase the base FAR to the levels proposed in the August 2020 draft CPIO so that Hollywood can continue to grow.

Respectfully,

Michael Nazzal
Yorkwood LLC

February 17, 2021

Dear Members of the Los Angeles City Planning Commission,

Thank you for the opportunity to provide public comment on case number case number CPC-2016-1450-CPU, the proposed Hollywood Community Plan Update (community plan) and Community Plan Implementation Overlay (CPIO). My name is Marty Shelton, and I am the representative for a property at 6500 Hollywood Boulevard in Hollywood. It is critical that Hollywood have an updated community plan to provide policy makers, investors, and the community at large with a clear picture of how our neighborhood can evolve to address some of our biggest challenges such as congestion and housing affordability while seizing opportunities to create a more vibrant, beautiful, and economically strong area.

The community plan should promote an equitable balance of different development types, as a healthy Hollywood is a multidimensional area that thrives when its major economic drivers – professional and storefront businesses, tourism, the entertainment industry, and the residential neighborhood – are collectively healthy and strong. As presented, the CPIO offers some significant process-related improvements and tools for producing the projects that will contribute to that collective wellbeing. However, the 33% down-zoning in base floor-area-ratio (FAR) is problematic and presents challenges to the economic viability of the new investments needed to advance the goals articulated in the plan. Please increase the base FARs to the levels proposed in the August 2020 draft CPIO to help facilitate the positive development of Hollywood.

Respectfully,

A handwritten signature in black ink that reads "MARTY SHELTON". The letters are cursive and slightly slanted to the right.

Marty Shelton
Vice President
NAI Capital Commercial
(310) 440-8500



Planning CPC <cpc@lacity.org>

City Planning Case: CPC-2016-1450-CPU

Melissa Tillman <melissajillman@gmail.com>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 6:58 AM

Good Day

Please stop all the give aways to developers by requiring affordable units in every new building. We need everyone to take responsibility to end our housing crisis! We need AFFORDABLE HOUSING NOT LUXURY now!



February 18, 2021

Melrose Arts District
BID Board of Directors:

City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Deny Weintraub
President

Sylvia Weintraub
Corporate Secretary

RE: CPC-2016-1450-CPU

Julian Chicha
Treasurer

Honorable Commissioners,

Pierson Blaetz
Greenway Arts Alliance/
Melrose Trading Post

The Melrose Arts District BID Board has had an opportunity to review the August 7th draft of the Hollywood Community Plan Update "HPCU" and related Hollywood Community Plan Implementation Overlay "CPIO".

Isack Fadlon
Sportie LA

At their regular meeting on October 9, 2020 the Board passed a unanimous motion with support and recommendations for elements of the HPCU.

Daniel Farasat
Tiger West Capital

The Melrose Arts District is managed by the Melrose Avenue Business Improvement District "BID", a five-year property-based district formed by a vote of the commercial property owners that assess themselves for its cost of operation.

David Hay
Spacegrab.com

Fred Rosenthal
Ametron Audio/Visual

The Melrose BID proactively works to revitalize and enhance the commercial viability of Melrose Avenue between Highland and Fairfax Avenues through the following improvements and activities; ambassador, security, and parking services; landscape, sanitation, and beautification services; marketing and promotions; new business attraction; and policy advocacy on behalf of its stakeholders.

Donald R. Duckworth
Executive Director

The update to the Hollywood Community Plan and related CPIO take on particular urgency given the 2020 COVID19 pandemic and its profound social, health and economic impacts on our community. Our comments take on the additional weight of realized short term and long term impacts from COVID19 pandemic devastation and necessitated government mandates restricting business operations. Simply put, COVID19 impact recovery must be included as a primary objective for the HPCU and CPIO.

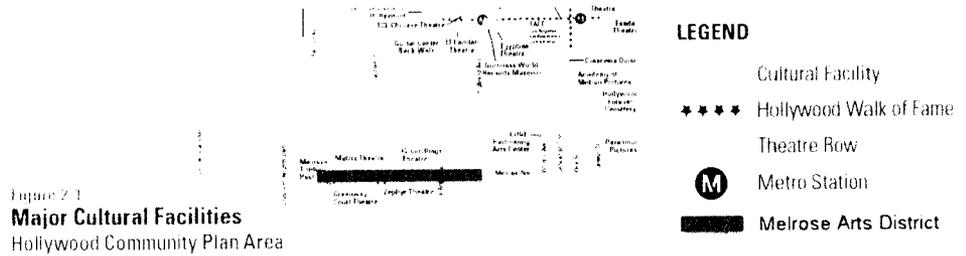
1934 Wilson Avenue
Arcadia, CA 91006
323.525.0840

www.melroseartsdistrict.com
FB: @melroseartsdistrict
Tw: @melroseartsdist
Inst: @melroseartsdistrict

Hollywood Community Plan Comments:

- Recommend: Designation and Identification of the “Melrose Arts District” on the plan exhibits and language.

Identify the Melrose Arts District on Figure 2-1 “Major Cultural Facilities”



Page 2-8 Paragraph 2 currently ends, “Melrose Avenue is the largest neighborhood-serving commercial corridor that caters to both local and regional visitors.” We recommend adding the following language: “It also includes the Melrose Arts District located on Melrose Avenue, from Highland to Fairfax Avenue, featuring world-renowned street art installations, as well as fashion, theater and culinary art enterprises involving over 300 alternative and independent small businesses.”

Hollywood Community Plan Implementation Overlay “CPIO” Comments:

- The Melrose BID supports rezoning Melrose Avenue between Highland and Fairfax Avenue from the C4 Zone to the C2 Zone as currently proposed. Many traditional uses that define the existing cultural and pedestrian character of the Melrose Arts District are grandfathered in and prohibited in the C4 zone, such as tattoo parlors, secondhand clothing stores and dance/fitness uses. The C2 Zone allows new tenants can be consistent with the character of the district.
- The Melrose BID supports as currently proposed: No Additional off-street automobile parking required for changes of use within an existing commercial space in Commercial Corridor 5. This is critical to fill vacancies triggered by COVID19. The development pattern along Melrose is long-established and the consensus from neighbors, business owners and property owners is that the existing character of Melrose Avenue should be maintained. It cannot be maintained if new uses must meet higher parking standards that require additional density, massing and height.

Handwritten signature:
Honorable F. W. [unclear]
EXEC DIRECTOR, MELROSE BID



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Joshua Paget
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Roque Wicker

May 11th, 2019

Honorable City Council
c/o Office of the City Clerk
Los Angeles City Hall
200 North Spring Street, 5th Fl
Los Angeles, CA 90012-2601

cc: Linda Lou
City Planner

Subject: Changes to Hollywood Community Plan

The Mid City West Community Council, an official Neighborhood Council of the City of Los Angeles, requests that the following Community Impact Statement be attached/added to a Council File for the Hollywood Community Plan update when available with the following motion:

We, the Mid City West Community Council, are writing to urge significant changes to the Hollywood Community Plan to protect tenants, encourage more sustainable transportation and ensure the creation of more needed affordable housing rather than luxury commercial or entirely market-rate housing development. The proposed Hollywood Community plan does nothing to address the crisis of displacement in the plan area, which lost 12,500 largely working-class residents from 2000-2010. The plan as written undermines current incentives to build affordable housing while incentivizing luxury hotels over the creation of new housing.

Mid City West Community Council supports the 4H Plan - "Hawks, Housekeepers, Housing and Habitat" Plan and specifically encourages the inclusion of the following provisions in the community plan:

1. Ensure that upzoning is tied to affordable housing production. Do not undermine incentive programs like Transit Oriented Communities Program or Density Bonus;
2. Do not favor hotels. Replace the proposed hotel-favoring upzone at Melrose & Fairfax and Melrose & La Cienega and ensure that affordability standards are put in the conditions allowing increases in density for mixed-use developments;
3. Create planwide anti-displacement policies to protect rent-stabilized and affordable housing stock including:
 - An area-wide ban on condo conversions and small lot subdivisions on multifamily-zoned lots if vacancy rate is less than 5 percent or there is no accurate estimation of vacancy rate for the past year;
 - Require commercial projects that are on land where the Ellis Act has been invoked or will be invoked to get rid of rent stabilized or affordable units to replace any units demolished with affordable units before the new certificate of occupancy is granted;
 - Fix TOC and density bonus incentives so that there must be a significant net increase in affordable housing relative to existing rent stabilized housing in order to use the incentive on an Ellis building. Require that all existing rent-stabilized units be replaced on a one to one basis with affordable units to access these incentives but do not count those number of units toward the required number of units to use the density bonus or TOC incentive;
4. Require a hotel conditional use permit, appealable to City Council that allow the City to consider measures taken by the project sponsor to encourage transit use and local hiring to reduce traffic demand and the impact of the project as well as on housing and small businesses as laid out below:

In addition to the standard conditional use permit findings, we urge the City be required to consider the following for Hollywood hotel projects:

- a. The impact of the project and future employees of the hotel or motel on the demand in the plan area for housing, public transit, child-care, and other social services;

b. The measures that will be taken by the project sponsor to employ residents of Hollywood in order to minimize increased demand for transportation(c) The measures that will be taken by the project sponsor, including a transportation demand management plan, to encourage hotel workers and visitors alike to use public transportation, cycling and other non-auto means of transportation;

c. The effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures by the project sponsor to increase demand for local goods and services;

d. There is sufficient market demand for hotels, motels, or transient occupancy residential structures of the type proposed;

The City shall also find:

e. The project will not negatively impact the housing affordable to Angelenos within the plan area;

5. Tie any new commercial upzoning to special findings and programs including transit passes, set aside of land for bike lanes and/or truly publicly accessible open space, and requiring new buildings to be LEED Gold.

This Community Impact Statement was voted on as a properly agenda item during the regularly scheduled Board of Directors meeting on April 9th, 2019, and passed by a vote of 17 yeas, 1 nay, and 2 abstaining and directed that a Community Impact Statement be filed reflecting its position.

Thank you for your attention to this matter. Please feel free to contact us via email at sepstein@midcitywest.org, mberker@midcitywest.org, or <mailto:knakata@midcitywest.org> as needed.

Sincerely,

Scott Epstein
Chair
Mid City West Community Council

Cc: Linda Lou, City Planner “
Councilmember Hon. Marqueece Harris-Dawson “
(Chair, PLUM Committee)
Councilmember Hon. Bob Blumenfield “
(Vice Chair, PLUM Committee)
Councilmember Hon. Gilbert A. Cedillo “
Councilmember Hon. Curren D. Price, Jr “
Councilmember Hon. Greig Smith “
Rita Moreno, Legislative Assistant, PLUM Committee “
Eric Villanueva, Alternate Leg. Assistant, PLUM Committee “
Councilmember Hon. Paul Koretz “
Councilmember Hon. David E. Ryu “
Office of Council District No. 5, Aviv Kleinman “
Office of Council District No. 5, Jeff Ebenstein “
Office of Council District No. 4, Emma Howard “
Office of Council District No. 4, Rob Fisher “



Planning CPC <cpc@lacity.org>

Hollywood Plan

misterkonik@aol.com <misterkonik@aol.com>

Wed, Feb 17, 2021 at 7:14 PM

Reply-To: misterkonik@aol.com

To: "cpc@lacity.org" <cpc@lacity.org>

To Whom it May Concern:

I live in the Sunset Square neighborhood, an HPOZ. For more than a decade I and my neighbors, working in concert with your department, came up with a workable plan for the historic area on Sunset Blvd between Fairfax and Vista. Despite the outrageous betrayal of our newly elected Councilmember, we the stakeholders want this area to have height restrictions. This is what is appropriate (and previously agreed upon).

Keep the Sunset Corridor in Sunset Square and Spaulding Square HPOZs a low-rise zone. Furthermore, the plan MUST include and demand affordable housing. Currently that doesn't seem to be required. That's a mistake.

sincerely,
MK

MichaelKonik.com



Planning CPC <cpc@lacity.org>

City Planning Case: CPC-2016-1450-CPU

NINOSKA SUAREZ <ninoskasuarez@me.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 3:09 PM

Good Day

Please stop all the give aways to developers by requiring affordable units in every new building. We need everyone to take responsibility to end our housing crisis! We need AFFORDABLE HOUSING NOT LUXURY now!



Impose height restrictions

Noelle <noellemarie22@gmail.com>

Thu, Feb 18, 2021 at 9:31 AM

To: cpc@lacity.org

I'm writing in response to CD4 councilwoman Nithya Raman's February 17, 2021 letter to the President of the City Planning Commission. While I agree with most of the positions put forward in her letter, I strongly disagree with relaxing height restrictions on any development in the Sunset Corridor. Her position does not represent my point of view, and, I believe, it is ill-advised.

The solution to the affordable housing crisis is not to allow developers to build high rises on iconic Sunset Blvd. It will dramatically increase traffic, which will pose safety issues for residents, and could lead to constant gridlock. It will create a massive public safety concern in the event of an earthquake and set a precedent that could result in skyscrapers along Sunset Blvd. Establishing "high density in urban areas" can only be successful achieved in cities with fully integrated and highly functioning public transportation systems, which we do not have in LA. Sunset Blvd should remain low density, and easily accessible, as it's such an important part of LA culture. Skyscrapers are better suited in DTLA.

Thank you.

Sent from my iPhone



Sunset Square HPOZ

Pamela Bothwell <pamelabothwell@gmail.com>
To: cpc@lacity.org, linda.lou@lacity.org

Wed, Feb 17, 2021 at 10:03 PM

Dear City Planning Commission,

As a resident of Sunset Square neighborhood org, I am completely outraged by Nithya Rahman's last minute letter opposing proposed zoning on the residential/HPOZ part of Sunset Blvd, from Fairfax east to Vista.

We have spent YEARS working on appropriate zoning for our sensitive part of Sunset Blvd, zoning which is suitable and required for our residential community. We have very specific reasons for asking for, and being given, the current proposed zoning in the CPIO draft, pages 48-62, i.e., sunset blvd from Fairfax east to Vista, not the least of which is:

- a public elementary school that was previously threatened by inappropriate zoning
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes
- The complete appropriateness of current height designation for 3 story residential
- The complete appropriateness of preserving the commercial corner
- The complete appropriateness of neighborhood friendly commercial
- And last, but certainly not least, TWO one hundred+ year old HPOZ neighborhoods which directly abut these 10 blocks.

I have worked for years with my neighbors and with the support of our previous City Councilman, David Ryu, to obtain the HPOZ zoning status and I am extremely disappointed that our new councilperson does not understand, respect or support the needs of her constituents.

I support and want the proposed CPIO draft to remain as is [CPIO draft, pages 48-62, i.e., Sunset Blvd from Fairfax east to Vista], and I respectfully request that you keep it so.

Thank you,

Pamela Bothwell

[1522 N. Fairfax Ave., LA 90046](#)

Hollywood Community Plan Update, February 18, 2021

City Planning Case: CPC-2016-1450-CPU
Environmental Case: ENV-2016-1451-EIR

Rafal Szwarc,
269 Bristol St Northfield, IL 60093
+1(312) 375 6132 info@spacedllc.com
the owner of the adjusted properties 1945 Jewett Dr:
5567018014 & 5567018015

We oppose the proposed conversion of the zoning of the property APN#: 5567018017 from R1-1-HCR into OS-1XL .

1. I believe that my properties as well as my neighbors' properties have great values. I purchased these properties with a goal to develop them. The proposed variance/ zoning change will adversely affect me, my properties and the neighborhood properties.
2. Because of the pandemic, communication with the owners of the adjacent properties and the LA county Assessor Property Data Base Center was limited. We need more time to organize and properly respond.
3. In 2008/2009, the city of Los Angeles made substantial improvements. Two sewer vaults were built in order to support future development of Jewett Dr. and the adjacent properties of the hill. For many it was a pretty strong signal to make investment into Jewett Dr.
Please see photographs attached 1, 2, 3.

There are several obstacles to the development of Jewett Hill:

- a. The residential garage blocking the entry to the Jewett Dr. makes even brush clearance almost impossible. All the debris had to be hauled on the contractor's shoulder because of the poor access to the properties. On the other hand, there was a lot of after-squatters and "post-party" debris to be cleaned and hauled away.(in first year after the purchase of the property roughly 40-50 garbage bags)
All neighbors had hoped that in the future maybe something will change on Jewett Dr and access to their properties but it never happened.
- b. Because of the fire code requires the road be accessible by fire engine Jewett Dr. didn't have enough clearance at the end to create cul-de-sac so fire truck can make turn back. (another side of Jewett – passage into Utica Dr. is also blocked)

However there is possible solution:

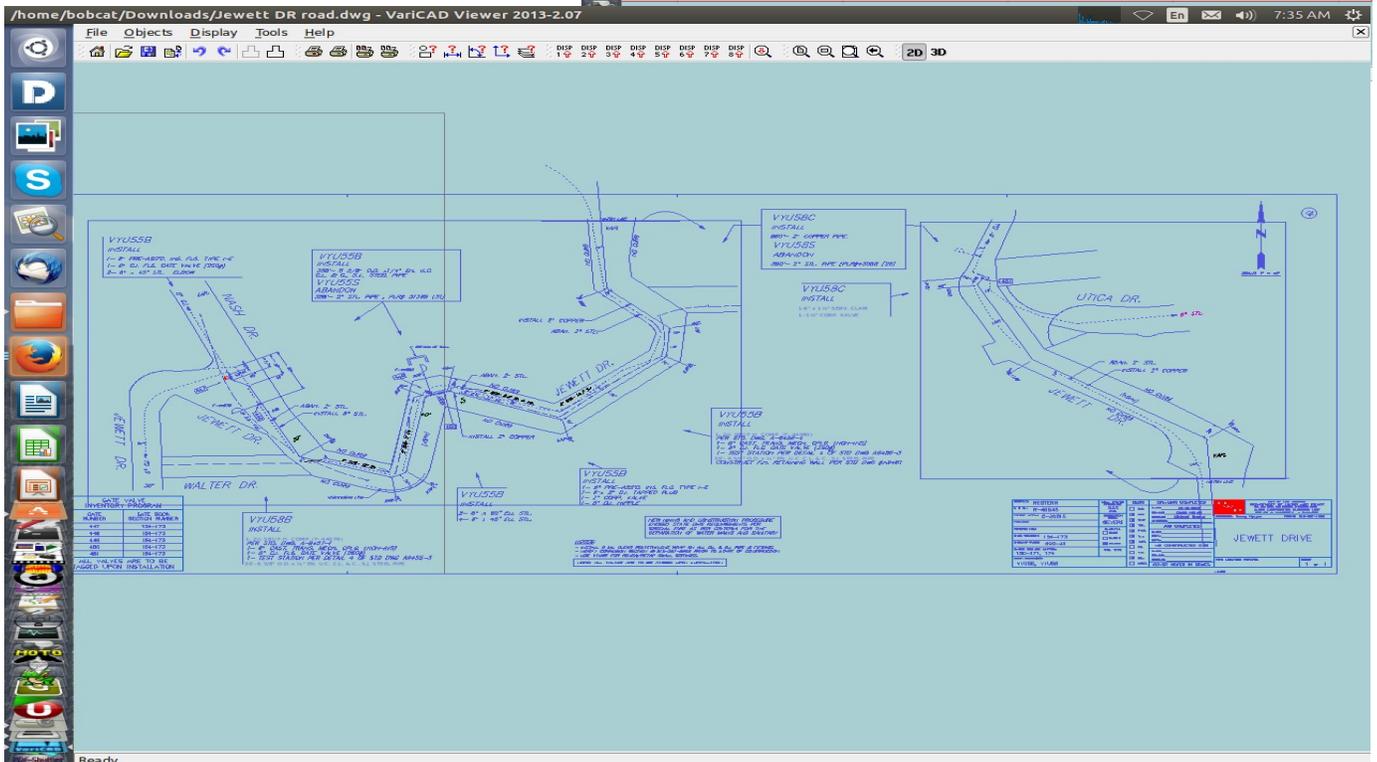
According to the section: D 700 VACATION OF PUBLIC RIGHTS-OF- WAY

AND CERTAIN OTHER RIGHTS The City council is the authorized entity in the City of Los Angeles to vacate public rights-of-way and certain other rights, as set forth in Section 556 of the Los Angeles City Charter revised July 1, 2000 (LACC). The neighbors will be responsible to develop the road with required utilities, fire hydrants etc.

Based on the information I presented I hope Hollywood Community Plan Committee will refuse proposal to change zoning of adjacent lot APN # 5567018017 and instead help us to facilitate further residential of the area.

4. Attached Pictures:

1. Title Block from the utility improvement by City of Los Angeles.





2. The first vault on Jewett Dr.



3. Second Vault build by City Of Los Angeles on Jewett Dr.



4. Jewett Dr.



5. Garage on Jewett Dr.



6. Garage on Jewett Dr with narrow path by the cliff.



7. Garage on Jewett Dr.



8. Jewett Dr.





10. Debris, old dishes, empty bottles, cloths and branches. Roughly over 40 contractor heavy duty plastic bags. Picture from 2017.



Planning CPC <cpc@lacity.org>

Affordable Housing

Retta <retta@circuitmap.com>
To: cpc@lacity.org

Wed, Feb 17, 2021 at 3:08 PM

Please reform the Hollywood Community Plan!

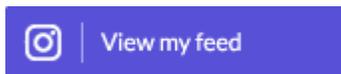
Affordable housing must be preserved and families must be protected from displacement, which contributes to the already dire homeless crisis in Los Angeles.

So many people hope you do the right thing.

Thank you,
Retta



Retta Putignano
Actor, writer, producer
323.630.2151 | retta@circuitmap.com
rettaputignano.com
Los Angeles, CA





Hollywood Community Plan

Sarkis Der Sarkissian <sarkisrealty@sbcglobal.net>

Thu, Feb 18, 2021 at 10:11 AM

To: "cpc@lacity.org" <cpc@lacity.org>

We own property in the community plan for zone changes.

The property we own is a shopping center in Hollywood and we are hurting with tenants that we can not sign leases because the zone use to be C-4 then it was changed to R-3, and I understand that it is recommended by the community plan to zone back to C-4.

When is it anticipated that the Hollywood Community Plan to go to City Council for approval and Mayor to sign into law?

Sarkis Der Sarkissian

President

Sarkis Realty, Inc.

BRE # 00284724

www.sarkisrealtyinc.com

323-874-5100 **Ofc.**

323-874-5111 **Fax**

323-697-3555 **Cell**



Hollywood Community Plan HCPU2 CPC-2016-1450-CPU

sschw56079@aol.com <sschw56079@aol.com>

Thu, Feb 18, 2021 at 5:06 AM

Reply-To: sschw56079@aol.com

To: "cpcequity@lacity.org" <cpcequity@lacity.org>, "cpc@lacity.org" <cpc@lacity.org>, "linda.lou@lacity.org" <linda.lou@lacity.org>

Sent: Thu, Feb 18, 2021 4:53 am

Subject: Hollywood Community Plan HCPU2 CPC-2016-1450-CPU

DRAFT HOLLYWOOD COMMUNITY PLAN HCPU2
CPC-2016-1450-CPU

Dear City Officials,

I am responding to the draft Hollywood Community Plan presented in January 2021.

1) There is a shocking and enormous consideration that has basically been ignored throughout the HCP.--general public safety--and specifically fire danger. We have just experienced the worst fire season in California history with the enormous costs in lives and property. Global warming will only make conditions more dangerous. Much of the land and thousands of homes in the Hollywood Community Plan sit in formally designated very high fire severity zones. **These areas are in the Hollywood Hills. When a fire comes the only way to evacuate is to the south into the regional center of Hollywood.** The conditions in Hollywoodland are even worse. We are more vulnerable than any other neighborhood as we sit as a bottleneck that juts further north into Griffith Park, and we are therefore 80% surrounded by dry brush with limited ingress and egress and substandard infrastructure. We cannot just evacuate to the south because Beachwood Drive our main route dead ends to the south as it is cut off by the Hollywood Freeway. Many nearby streets including Franklin and Gower are already gridlocked for hours everyday. **How are you going to evacuate--not just Beachwood Canyon--but all of the other hillside areas when you are increasing development and density to the south in areas that are already gridlocked and not increasing road capacity and infrastructure?** These considerations need to be included in 3 Land Use and Urban Form, 4 Public Realm, Parks and Open Space, and 6 Mobility and Connectivity. In fact the public safety issue and fire issue is so pervasive and significant throughout this part of the City it probably merits its own chapter.

2) 5-12 Notable Historical and Cultural Districts and Features. " Hollywood's notable districts appeal to a wide range of visitors, making them regionally and even globally significant." You then feature a number of COMMERCIAL areas like The Hollywood Walk of Fame, Thai Town, Hollywood Blvd, Theatre Row etc. But what is listed FIRST is Hollywoodland, an extremely limited and vulnerable R1 neighborhood with aging one hundred year old infrastructure with narrow streets and no sidewalks that barely handles the needs of its resident!. It is the most fire vulnerable location in the entire City. **Remove Hollywoodland from this list of tourist destinations and places of interest.** As you say Hollywood can attract 26 million visitors annually, and the most inappropriate and dangerous place for these people is in Hollywoodland. This also violates one of your purposes stated over and over again throughout the plan--to protect the character and safety of vulnerable and historic residential neighborhoods.

3) 4-6 Open Space Map Figure 4-2. On the map you show the parks throughout the Hollywood area. You are missing Lake Hollywood Park. You show it as being part of Griffith Park. It is not and has a totally different origin and was created by the developers of Lake Hollywood Estates in the 1960's to be a pocket park for the use of nearby residents whose hillside lots offer little flat open land that is available in this park. It only a butts Griffith Park. It is also left off the list of pocket parks 4-8. **Add Lake Hollywood Park to the Open Space Map and to the list of parks.** Also on Figure 4-2 **Beachwood Drive**, though not named, is highlighted by a thickening of the street. It leads to nothing. Yet Canyon Drive and Bronson Drive which lead to an official entrance to Griffith Park are not named or highlighted with a thickening of the street on the map. **Remove the highlighting of Beachwood Drive.**

4) 3-9 General Plan Land Use Map Figure 3-1. **I believe the categorization of Hollywoodland into two different densities of Low I and Low II is incorrect.** The extremely limited infrastructure dictates that it should be Minimum or Very Low II, the same as other nearby hillside neighborhood.

5) 6-3 Circulation System Map Figure 6-1. **Beachwood Drive** IN Hollywoodland is included on this map. It is mainly 30 feet wide and narrower with few sidewalks and both sides of the street parking. It is narrower than the 36 foot width of a limited standard hillside street. Part of it is also listed as a collector street. It is substandard and dead ends. There is also no need or reason that it should be highlighted, included or featured in any way. **Remove the highlighting of Beachwood Drive in Hollywoodland.** Incorrect data cannot only prove dangerous but can lead to litigation which can greatly prolong the process of creating a new HCP.

6) While the name Beachwood may not always appear, Beachwood Drive is highlighted on map after map and appears to be a major boulevard like Highland or Western. This is incorrect, and because Beachwood dead ends, the featured segment is only one mile long. There is no reason for it to be highlighted on all of these maps and gives a false impression that can be dangerous. **Remove the name and/or the thick line that highlights Beachwood Drive on Figure 1-3, Figure 1-4, Figure 2-1, Figure 3-1, Figure 4-1, Figure 4-2, Figure 6-3, Figure 6-4.**

Please make these changes. As I stated earlier incorrect data is not only dangerous but can lead to time consuming litigation.

Please contact me if you have any questions and make this letter part of the public record along with my earlier comments.

Thank you.

Sincerely,

Sarajane Schwartz

Homeowners on Beachwood Drive United.



Hollywood Community Plan Update

Susan Winsberg <susanwinsberg@sbcglobal.net>

Thu, Feb 18, 2021 at 1:47 AM

Reply-To: Susan Winsberg <susanwinsberg@sbcglobal.net>

To: "cpc@lacity.org" <cpc@lacity.org>

Cc: Meg Healy <meg.healy@lacity.org>, "craig.bullock@lacity.org" <craig.bullock@lacity.org>

Dear members of the Planning Commission,

I would like to state my opposition and deep concern regarding the Hollywood Community Plan Update.

These are my concerns:

It will create **too much density for our current infrastructure**. It's definitely putting the cart before the horse to create the density before the infrastructure is in place. And if you think Angelenos are going to suddenly stop driving or start riding bikes, just because the traffic has become untenable, you're wrong. I work in Sherman Oaks and live in Hollywood. Will I suddenly be adding two hours to my commute every day so I can take the bus? Franklin Avenue, where I live, is already completely gridlocked most of the time (or at least it was before Covid), and with two lanes on Hollywood Blvd. shut down, with exponentially more density, it promises to become an utter purgatory. You're obviously not concerned about the quality of life of us stakeholders, but rather how much wealth will be generated for those who already have it -- developers and their politician buddies.

This **increased density directly threatens our historic resources**. Already we're losing our history and character and the very fabric of our neighborhoods hand over fist from over development. This plan will be an overdose of steroids on top of what we already have. If you want Los Angeles to look like a generic, cookie-cutter town -- Anytown, USA -- then that's what this plan will achieve. And once again, it won't be for the benefit of the common person, since most of this new housing will be market rate. Knocking down our historic buildings, whether they've been landmarked or not, is NOT the way to go. Just because it's not in an HPOZ or it's not a HCM doesn't mean it should be discarded. And even HPOZs and HCMs are at risk under this plan, something that would simply be unheard of in any other major city. This glib disregard of our history is terribly misguided, and will be something of deep regret for generations to come.

There is an extreme and unconscionable **lack of community input in this plan's decision-making process**. Once again, the regular stakeholder is left out, while his entire quality of life, his home, his routines, his well-being, are being dramatically altered by forces outside of his control. Sounds like a dictatorship to me. This is NOT the American way. Fast-tracking these huge decisions is just plain WRONG.

Hollywood is not your playground, it is not your sandbox -- it is OUR HOME. We need a say in this, and as it stands now, I say, IT STINKS!

Thank you for your attention,

Susan Winsberg
6536 Franklin Ave., apt. 1
Los Angeles, CA 90028

2/18/2021

City of Los Angeles Mail - Hollywood Community Plan Update

213-446-0362

February 18, 2021

File Number: 76DF-326572

VIA E-MAILLos Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, CA 90012
E-Mail: cpc@lacity.orgRe: Home of the Stars, LP's Comments on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

We represent Home of the Stars, LP ("Home of the Stars") who own the Gower Gulch Shopping Center located at 6110-6134 W. Sunset Boulevard, Los Angeles, California (the "Property") located within the Hollywood Community Update Plan area. This letter serves as our comment on the draft Hollywood Community Plan ("HCPU2") and the Community Plan Implementation Overlay ("CPIO") released on February 10, 2021 and under your consideration at the February 18, 2021 City Planning Commission hearing.

As stakeholder invested in Hollywood's future, Home of the Stars has been an active participant throughout the various public engagement opportunities during the multiyear development of the HCPU2, including providing a comment letter on December 16, 2020. We're encouraged by the progress made with inclusions of number of incentives such as elimination of Site Plan Review for affordable housing projects with less than 200 units, non-residential development bonuses for offering public accessible outdoor amenity spaces, and the change of zoning from C4 to C2 throughout the Regional Center. However, the issue of decreased base Floor Area Ratio ("FAR") in some areas of the Regional Center raises serious concern among the business community in Hollywood, including that of Home of the Stars. While the need to provide additional affordable housing in Los Angeles is of utmost priority, it is important to do so in a manner that ensures success and is complementary to other uses.

The reduction of the base FAR to as a means to incentivize affordable housing through bonus FAR is counterproductive. The proposed changes are too onerous on developers and will make Hollywood a less desirable area to build. In reality, development projects in Hollywood will no longer pencil, so less units will be built because less density is permitted, not more. The development cost of additional affordable housing needs to be balanced with that of other development, and the proposed changes clearly only focus on affordable housing, which alone will not be successful when not considering what contributes to the health and needs of a community. This does not achieve the stated goals in the HCUP2 to create "residential and commercial density, transit-oriented districts, affordable housing, and employment opportunities near transit infrastructure that supports sustainable and walkable neighborhoods."¹

¹ Draft Hollywood Community Plan (February 2021), pp. 3-21. Goal LU9.

By allowing higher base FAR, such as those proposed in the August 2020 draft of CPIO, property owners and developers can create projects serving other vital community uses, such as commercial and job generating establishments. Further, a balance of housing at various income levels is needed in order to provide additional workforce housing and moderate-income housing. Most Angelenos do not meet the affordable housing income requirements and therefore would not qualify. Providing additional housing and other uses that are complementary builds the foundation of a vibrant transit orientated community.

In addition to the affordability requirements, the CPIO currently uses the lower rents set in Housing and Community Investment Department (“HCIDLA”) Land Use Schedule VI rather than Land Use Schedule I. We recommend that the City permit Schedule I rents to offset the additional affordable units required under the CPIO.

Compounding the issue is the ongoing homeless crisis that the City continues to grapple with and the undue burden many property owners and small business face in Hollywood. Gower Gulch continues to maintain a safe and inviting environment for both tenants and patrons but needs the support of the City to do so in order to operate successfully. As a direct result of the homelessness issue, Gower Gulch will be losing its anchor tenant this year. It is unclear how the HCUP2 address the issue as it is discussed minimally throughout the document. In addition, providing the means to provide a mix of uses at higher densities, the Plan needs to also identify opportunities to deal with long term homelessness that is humane and achievable.

Gower Gulch Shopping Center has been a family-owned property for over 40 years and Home of the Stars is deeply concerned with the unintended consequences the proposed CPIO presents to their property and the surrounding area. As the business community continues to face challenges during the COVID-19 pandemic and unprecedented levels of homelessness, encumbering future development only exacerbates these issues and limits their ability to adapt to market demands. The Plan needs to provide flexibility to pursue opportunities that integrate a mix of uses at higher densities, including affordable housing, but also workforce housing and job generating uses. A potential tenant seeking to develop in the area would overlook the Property for other sites or communities that permit additional FAR. Without incorporating the requested changes, the City could lose a key, transit-oriented parcel in Hollywood that could be activated to the Property’s highest and best use.

Very truly yours,



Alfred Fraijo Jr.
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
SMRH:4840-4589-0269.2

cc: Craig Weber, Los Angeles Department of City Planning
Linda Lou, Los Angeles Department of City Planning
The Honorable Mitch O’Farrell, Council District 13
The Honorable Nithya Raman, Council District 4
The Honorable Paul Koretz, Council District 5



Planning CPC <cpc@lacity.org>

HCPU Item 06: Please take 3.5 mins to watch Spaulding Square's video. We are an HPOZ which directly abuts Sunset Blvd/Corridor 5.

Spaulding Square <spauldingsquare@gmail.com>

Thu, Feb 18, 2021 at 10:49 AM

To: cpc@lacity.org

Cc: Lesley O'Toole <lesleyotoole@gmail.com>

City Planning Commissioners,

I am the Co-President of the Spaulding Square Neighborhood Assoc. Spaulding Square was Los Angeles' 7th historic preservation overlay zone, incorporated in 1993, and comprises 160 single family homes within four blocks, just east of Sunset/Fairfax.

If you are unfamiliar with this pristine Hollywood district (home of Lucille Ball's first LA home and multiple homes of historic and entertainment industry interest), I urge you to take a few minutes to understand why you are about to be besieged by public comments relating to Nithya Raman's appalling last minute bombshell, asking that the height requirements for Sunset Blvd./Corridor 5 be reduced. Ms. Raman campaigned on a platform of protecting HPOZs.

https://www.youtube.com/watch?v=KRX_5E1BS3k

We the constituents and stakeholders have worked for years to preserve our area, which is already overrun with traffic and people parking on our streets because they live in buildings with no parking, while accepting that some development is of course inevitable.

We urge you to adopt the HCPU as drafted.

Thank you.

Lesley O'Toole
Co-President
Spaulding Square Neighborhood Assoc.



Planning CPC <cpc@lacity.org>

Leave the

StuAFine <stuafine@aol.com>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 10:43 AM

CPO Draft as is.

Sent from my iPhone - please forgive typos



We LIKE our draft: HCPU/CPIO/pages 48-65 of the CPIO, ie, Fairfax blvd east to Vista Avenue

sunset square <sunsetsquarehwd@gmail.com>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 8:00 AM

Dear Commissioners: I am president of Sunset Square Neighborhood Org. My community has *done* its homework. We started meeting and speaking with HCPU planners more than 3 years ago to discuss the zoning that our community needed. We invited the planners to our neighborhood and we walked our streets. We explained our issues and concerns. We drew our then councilman, David Ryu, and his planning deputy Emma Howard into the conversation. We looked at every draft of every plan. We did many meetings, phone conferences, and communications, working with our planners.

What was the result??? **We came up with a draft of the plan that WE LIKE.** On pages 48-65 of the CPIO, ie, Fairfax blvd east to Vista, that reflects the CAREFUL WORK we did in our community with the planners. Please recommend the adoption of the draft as it applies to our community in the CPIO on pages 48-65 of the CPIO, along Sunset Blvd, from fairfax east to Vista Street. [Some of] The reason for zoning that appears in this draft? There are many, but some salient ones include:

- a public elementary school that was previously threatened by inappropriate zoning
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes,
- The complete appropriateness of current height designation for 3 story residential
- The complete appropriateness of preserving the commercial corner,
- The complete appropriateness of neighborhood friendly commercial
- And last, but certainly not least, TWO 100+ year old HPOZ neighborhoods which directly abut these 10 blocks.

We have big plans for that area of Sunset, including an arts district, a pedestrian centered destination around the remaining Red Car Line depot. PLEASE ADOPT THE PLAN AS IT APPLIES TO OUR COMMUNITY, PAGES 48-65 OF THE CPIO, FAIRFAX BLVD to VISTA [along Sunset Blvd]. Thank you, Cheryl Holland

cheryl holland president | sunset square neighborhood org | sunsetsquarehollywood.org



P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org



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City Planning Commission

February 18, 2021

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Torreyson Flynn Assn.
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

**Re: #6 Hollywood Community Plan
CPC-20166-1450-CPU**

Dear Commissioners:

The Hillside Federation has already submitted several comments on the Hollywood Community Plan.

In several cases entire city blocks of affordable housing units are being demolished to build large multi-story developments that provide fewer affordable units than what previously existed on that site. The requirement for affordable units should be changed to require the percentage of required affordable housing *on top of* the number of destroyed housing units such that the number of affordable units is increased rather than decreased. These units should remain affordable in perpetuity otherwise we will experience a huge increase in homeless in thirty years.

The Federation reiterates its request for restrictions on increased density in Very High Fire Hazard Severity Zones. Parcels purchased by the Santa Monica Conservancy or Mountains Recreation and Conservation Authority for open space be rezoned Open Space and that the City rezone its vacant unbuildable property to Open Space.

Thank you for your consideration.

Sincerely,

Charley Mims

CHAIRS EMERITI
Shirley Cohen
Jerome C. Daniel
Patricia Bell Hearst
Alan Kishbaugh
Steve Twining
CHAIRS IN MEMORIAM
Brian Moore
Gordon Murley
Polly Ward



February 16, 2021

Samantha Millman
Los Angeles City Planning Commission President

Subject: case number CPC-2016-1450-CPU

Dear Ms. Millman,

Please accept this letter as public comment on the Draft Hollywood Community Plan Update (HCPU) and the Community Plan Implementation Overlay (CPIO) on behalf of The Hollywood Partnership. Our organization manages the Hollywood Entertainment District Business Improvement District (HED BID), which this year celebrates 25 years of property owners coming together to voluntarily tax themselves to raise revenue needed to manage and improve the community. The HED BID is primarily located within the Regional Center of the HCPU / CPIO. We also submitted a detailed letter dated Nov 19, 2020 in advance of the public hearing held in December 2020 and are pleased to see many of those recommendations reflected in the new drafts. We now respectfully offer additional feedback from property owners directly affected by the plan.

We commend City Planning staff for innovating on the last draft by creating the public open space incentive tool for non-residential uses. Hollywood is already an open-space deprived neighborhood, so this tool helps provide greater equity within the plan for supporting job creation while providing a sorely needed community benefit. However, there are certain provisions of the open space requirement, such as the restroom requirement, which will make this tool operationally challenging and may inhibit its utilization. **We recommend relaxing these operational requirements to get the open space that the community sorely needs.**

The latest draft of the CPIO also includes some significant changes that will improve the current, litigious climate for entitlements. These lawsuits add time and cost to projects which only result in higher rents, challenges to affordability and reduction in housing production. Increasing the site plan review threshold to 200 units for residential projects that hit their inclusionary mark is a huge step forward. However, **there is a need in the CPIO to also reference a corresponding building area threshold of 200,000 square feet as the current threshold for site plan review includes both a massing figure and unit count. Additionally, the same consideration should be applied to non-residential buildings qualifying for density bonuses through the provision of publicly accessible open space.**

Additionally, **expanding allowable ground floor land uses through a change from C4 to C2 zoning opens the opportunity for more businesses and creative uses to fill vacant storefront space** inside the Regional Center. Pre-pandemic, the regional center area had a 20% vacancy rate for ground floor space, and it now stands at nearly 25%. We will need innovation and creativity to help backfill that space.

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1645 Vine St.

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Yorkwood LLC

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Academy of Motion Picture Arts & Sciences

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Larry Wilkes
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6562 Hollywood Blvd,
Hollywood, CA 90028

(323) 463-6767

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@hollywoodpartnership



THE
HOLLYWOOD
PARTNERSHIP

For qualifying projects and changes of use, removing parking from the auspices of zoning makes a tremendous amount of sense. Investors and developers are best poised to assess the amount of parking needed to support their projects and given the dynamic and evolving nature of mobility preferences, should be empowered to make that type of decision rather than it be calculated by an antiquated land use metric.

Within the areas that require additional improvement, we believe there is a major opportunity lost in not powering-up the transferable density tool by enabling more FAR to be transferred from historic properties. Considering the rough condition of and seismic retrofit required for some of our most troubled historic assets, it would provide a significant public benefit to increase the allowable heights within the historic district to create more value that can be invested into the retrofit and preservation of these assets while enabling greater density elsewhere within the plan area that does not detract from the integrity of the historic district.

Finally, we were shocked to see the reduction in base FAR in the recent draft. Area property owners and stakeholders spent years working with City Planning staff to help inform the base FAR map recommended by planning staff in the August 2020 CPIO draft. Further, the 33% reductions in base FAR included in the Feb 2021 draft of the CPIO for about half of the Regional Center disregards the years of progress made in strengthening Hollywood's role as an employment center and economic generator for the City of LA. **Reducing density will have the unintended consequence of making all housing less financially feasible to develop and therefore undermine the plan's goal of producing the desired affordable housing.** It will also hinder the ability to foster job growth since developments of all types will be negatively affected. The plan should honor the years of work that went into creating the August 2020 base FAR map and not overcorrect in a manner that has severe consequences to the development of essential land uses. **We request that the base FAR map from the August 2020 draft be reinstated, and that CPIO offer the elevated site plan review threshold as the incentive for accommodating the affordable housing marks.** Time and predictability are valuable incentives that will help deliver the affordable housing intended by the CPIO bonus program and likewise encourage investment in our community.

Thank you for the opportunity to submit additional public comment on the HCPU / CPIO. We welcome your continued partnership in advancing this important plan for the community.

Sincerely,

Kristopher Larson, AICP
President & CEO

CC:

Mitch O'Farrell, Council Member, District 13
Caroline Choe, City Planning Commission Vice-President
David Ambroz, City Planning Commissioner
Helen Leung, City Planning Commissioner
Karen E. Mack, City Planning Commissioner
Dana M. Perlman, City Planning Commissioner
Yvette Lopez-Ledesma, City Planning Commissioner
Ajay Relan, City Planning Commissioner
Craig Weber, Principal City Planner

6562 Hollywood Blvd,
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www.hollywoodpartnership.com

[@hollywoodpartnership](https://twitter.com/hollywoodpartnership)



CPIO draft

kneedlersr <kneedlersr@gmail.com>
To: cpc@lacity.org, linda.lou@lacity.org

Thu, Feb 18, 2021 at

I am a long time resident of Sunset Square (corridor 5). We have worked with the city planning commission for so many years to have the proper height restrictions, etc. There are two HPOZ's here which are very fragile and essential to Hollywood and the preservation of this worldwide destination. We have very specific reasons for asking for, and being given, the current proposed zoning in the CPIO draft, pages 48-62, i.e., sunset blvd from fairfax east to v not the least of which is:

- a public elementary school that was previously threatened by inappropriate zoning
- A narrow, 1 lot deep frontage with zero parking or separation from the nearby homes,
- The complete appropriateness of current height designation for 3 story residential
- The complete appropriateness of preserving the commercial corner,
- The complete appropriateness of neighborhood friendly commercial
- And last, but certainly not least, TWO 100+ year old HPOZ neighborhoods which directly abut these 10 blocks.

We regret that Nithya Raman has expressed her hidden and ill thought out and sudden opinion. She has not studied the area. Our neighborhood organizations have. For years! Please disregard her freshman ideas about corridor 5. She doesn't know what she is talking about.

Respectfully,

Wendy Kneeder-Senior
DRE#: 01934735

8560 Sunset Boulevard, 3rd Floor, Los Angeles, CA 90069
o: 213.361.3503

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Public Comment to LA City Planning Commission: Item 6 (Hollywood Comm Plan) on Feb. 18, 2020 -- from Esperanza Community Housing

Rabeya Sen <rabeya@esperanzacommunityhousing.org>

Thu, Feb 18, 2021 at 9:16 AM

To: cpc@lacity.org

Dear Honorable City Planning Commissioners,

I am writing on behalf of Esperanza Community Housing (Esperanza) and in regards to Item 6, the Hollywood Community Plan, on your agenda for February 18, 2021.

At Esperanza, we provide healthy affordable housing and also work alongside the communities of South LA to achieve environmental justice, prevent displacement and gentrification, and support policies and programs that promote racial justice through equitable healthy land use.

As members of ACT-LA and founding members of the UNIDAD Coalition, we strongly urge you to ensure that this plan prioritizes equitable and healthy land use to address the issues of systemic racism, inequities, and health disparities – laid even more bare by the pandemic – driven by this city's history of land use and development decisions that have consistently ignored the needs of communities most impacted by these inequities. This is something towards which we progressed, together, when UNIDAD's People's Plan was incorporated into the South and Southeast LA Community Plans a few years ago.

Thus we urge you to do the following:

- Stop developer giveaways and enact value capture principles to increase the stock of healthy affordable housing at the deepest affordability levels.
- Enact effective anti-displacement measures that guarantee a zero-net loss of affordable housing, rather than allowing developers to count 1:1 replacement of demolished units as new AH.
- Consider the Central City United People's Plan's, which developed additional anti-displacement policy objectives for the Downtown LA Plan.
- Ensure that this plan considers health and environmental justice (EJ) concerns to ensure individual, community, and environmental health are preserved. Housing is a health and human right and to achieve this, we urge you to:
 - Use an environmental justice lens in Planning: Integrate the CalEnviroScreen into land use planning to target critical investments increasing access to affordable housing in underserved and highly impacted areas.
 - Land use compatibility and Industrial sites / brownfield sites:
 - Advance new standards such as requiring EIRs to include health impact assessment for a 2-mile radius
 - Prevent development in proximity to brownfield sites until full EIR/HIA and remediation is done
 - Prevent instances of incompatible land use by establishing strict health and safety buffers between hazardous and sensitive land uses, including a 2500-foot health and human safety buffer between oil extraction sites and sensitive land uses, and a 500-foot buffer between other noxious land uses, such as auto-related uses, and sensitive land uses
 - To ensure that EJ concerns are incorporated into infrastructure and development decision, we ask that the planning department work with the City's Climate Emergency Mobilization Department to ensure infrastructure alignment with principles of environmental justice and a just transition framework that puts an end to environmental racism and, thus, the displacement of low-income communities and communities of color, and uplifts public health through affordable housing.

Thank you,

Rabeya

Rabeya Sen

Director of Policy

Esperanza Community Housing Corporation



Planning CPC <cpc@lacity.org>

Opposition to Removal of height restrictions for Hollywood west of La Brea

SandraHitt <SandraHitt@twc.com>
To: cpc@lacity.org

Thu, Feb 18, 2021 at 9:13 AM

I am opposed to the removal of height restrictions in this residential area. Reasonable height restrictions have been in place to regulate density in certain areas that are used for evacuation routes for the high fire danger Hollywood Hills and surrounds. This is a safety issue as well as a historic preservation issue.

Sandra L. Hitt
Hollywood Hills West