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SECONDARY SUBMISSIONS



Department of City Planning

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

March 17, 2021

TO: City Planning Commission

FROM: Priya Mehendale, Senior City Planner

CLARIFICATIONS AND CORRECTIONS FOR CASE NO. CPC-2016-1450-CPU; HOLLYWOOD COMMUNITY PLAN UPDATE

Following is a list of clarifications, corrections, and additional content that is provided for incorporation into various exhibits attached to the staff recommendation report to be considered at the City Planning Commission meeting on March 18, 2021, related to Item No. 6 on the meeting agenda:

- 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 Hollywood CPIO District Map and Ordinance)
- Exhibit E (Proposed General Plan Land Use and Zone Change Maps and Matrices; Street and Network Classifications; Circulation Map; Symbols; Footnotes; and Corresponding Zone-Land Use Nomenclature Changes)

Changes noted as “Recommended” constitute technical corrections or clarifications to the subject exhibit to the Staff Recommendation Report dated March 18, 2021. Changes noted as “Optional” are provided in response to CPC deliberation that took place on February 18, 2021 relative to the subject exhibit, and may be useful for the CPC to incorporate as it concludes its deliberations.

Exhibit B (Draft Community Plan)

1. Optional: The CPC discussed a desire to strengthen public access to hillside open space and recreation amenities. Addition of the following new policies to the Policy Document can serve to further that goal:

PR1.20 Access to parks and trails. Support improved pedestrian access to public parks, including sidewalk enhancement and repair and wayfinding strategies.

PR1.21 Expand Access. Bolster opportunities for access and recreation at open space resources such as the Hollywood Reservoir.

M14.16 Transit to parks. Support expansion of transit to improve accessibility to parks and trails, including shared transit or on-demand services, and support Metro's efforts to implement its Transit to Parks Strategic Plan.

2. Optional: The CPC discussed a desire to support street vending as an avenue for economic opportunity, a form of access to healthy and affordable food, and a component of active street life. Addition of the following new policy can serve to further that goal:

PR2.9 Mobile Vending. Encourage and support mobile vending in plazas and along streets surrounding major transit stations, where permissible by County and City Law, as part of fostering a vibrant pedestrian environment. Consider supportive services such as commissary kitchens when considering public benefit agreements.

3. Recommended: To better align with the City's Heart of Hollywood project, revise Policy P1.5 and Program 34 in the Policy Document to read (new language underlined, deletions ~~struckthrough~~):

P1.5 Distinctive Street Features. Protect and enhance distinctive features of prominent streets in Hollywood, such as the Walk of Fame, a recognized Historic-Cultural Monument of the City of Los Angeles. (P34, P66, P138)

~~P34 Preserve and enhance existing street dimensions and street designation along the Walk of Fame.~~

4. Recommended: To clarify that the slope density provision applies to properties with Low Density land use designations, revise Policy LU1.4 in the Policy Document to read (new language underlined, deletions ~~struckthrough~~):

LU1.4 **Hillside Development.** Limit density in hillside areas. Notwithstanding any land use designation maps to the contrary, all projects on properties designated under a Single Family land use designation (Minimum, Very Low II, Low I, or Low II) with average natural slopes in excess of 15 percent, including both Tract Maps, and Parcel Maps shall be limited to the Minimum Residential General Plan land use designation (i.e. Minimum Density housing category of one dwelling unit per 40,000 square feet of lot area) ~~minimum density housing category~~ for the purposes of enforcing the slope density formula of LAMC Section 17.05C (Tentative Tract Maps) and 17.50E (Parcel Maps).

5. Recommended: To clarify housing related policies and future implementation programs, including eliminating a reference to a housing program that is no longer available, revise Programs 98-100, 103-106, and 108 in the Policy Document to read (new language underlined, deletions ~~struckthrough~~):

~~P98 Support the maintenance and rehabilitation of the existing single-family, multi-family and affordable housing stock for existing residents and encourage the use of the Housing Department's housing development programs, which provide financing~~

~~and loans for new construction, as well as the rehabilitation of existing low income single-family homes and multi-family apartments.~~

P99 Promote the use of available homebuyer programs that make purchasing a single-family home affordable such as the California Housing Finance Agency's First-time Homebuyer Program and FHA Loan Program ~~as well as the City of Los Angeles Housing Department's Neighborhood Stabilization Program.~~

P100 Coordinate with ~~the City of Los Angeles Housing Department~~ HCIDLA to create strategies for the provision of more bedrooms in new housing development which are suitable for larger families.

P103 Work with ~~LAHCIDLA~~, Council Offices, City Attorney and other relevant City Agencies to explore the creation of a no net loss program the minimizes the displacement of residents and ensures that there is no loss of covenanted affordable rental housing or the production of new affordable housing.

P104 Monitor the inventory of units that are subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the Rent Stabilization Ordinance, and/or occupied by Lower-Income or Very Low-Income households ~~during the effective term of Measure JJJ.~~

P105 ~~Study a program for the enhancement of RSO enforcement such as a neighborhood-based RSO Enforcement Specialists group responsible for proactively working with tenants, landlords, and community groups to enhance the habitability and prevent the loss of RSO units in the Plan Area.~~ Continue to proactively enforce the citywide RSO and explore new approaches for protecting tenants from displacement.

P106 Monitor the implementation of policies and programs relating to affordable housing and/or rental housing issues and opportunities. ~~The Affordable Housing Commission could be utilized for this purpose or another commission could be created.~~

P108 Support HCID ~~with~~ in exploration of a future effort to establish new programs and strengthen existing programs to provide former low income tenants of demolished or converted units with the first right of refusal on leases for new housing units.

Exhibit C (Proposed and Existing General Plan Land Use and Framework Maps, and Proposed Change to Chapter 1 of the Framework Element)

6. Recommended: To clarify that the slope density provision applies to properties with Single Family General Plan land use designations, revise General Plan land use map, Footnote No. 1 to read (new language underlined, deletions ~~struckthrough~~):

Notwithstanding any land use designation to the contrary, all projects on properties designated under a Single Family land use designation (Minimum, Very Low II, Low I, or Low II) with average natural slopes in excess of 15 percent shall be limited to the

Minimum Residential General Plan land use designation (i.e. Minimum Density housing category of one dwelling unit per 40,000 square feet of lot area) Minimum density category (1 dwelling unit per 40,000 square feet of lot area) for the purpose of enforcing the slope density formula in 17.05C (Tentative Tract Maps), and 17.50E (Parcel Maps).

Exhibit D (Proposed Hollywood CPIO District Map and Ordinance)

To correct a number of proposed subareas in the Proposed Hollywood CPIO District Map and Ordinance document, and clarify an illustrative map figure the following revisions are being made. Certain lots or parcels in the Hollywood CPIO Regional Center Subareas were miscategorized among the four types of Regional Center Subareas; see corrections below.

7. Recommended: The following properties will be corrected from Hollywood CPIO Regional Center Subarea RC2 to Hollywood CPIO Regional Center Subarea RC1A. The lots listed below are moved from Subarea 1002 to Subarea 1000:

Address	APN	Tract	Block	Lot
6779 W Hawthorn Avenue	5547012019	TR 10820	None	3
6775 W Hawthorn Avenue	5547012019	G. F. Stevenson Tract No. 2	None	FR 7
6769 W Hawthorn Avenue	5547012019	G. F. Stevenson Tract No. 2	None	FR 6
None	5547012019	TR 10820	None	2
6757 W Hawthorn Avenue	5547012014	G. F. Stevenson Tract	None	15
1653 N McCadden Place	5547012014	G. F. Stevenson Tract	None	15
1655 N McCadden Place	5547012014	G. F. Stevenson Tract	None	16
1659 N McCadden Place	5547012014	G. F. Stevenson Tract	None	FR 17
1654 N McCadden Place	5547014043	G. F. Stevenson Tract	None	2
1650 N McCadden Place	5547014043	G. F. Stevenson Tract	None	3

8. Recommended: The following properties will be corrected from Hollywood CPIO Regional Center Subarea RC3 to Hollywood CPIO Regional Center Subarea RC2. The lots listed below are moved from Subarea 1003 to Subarea 1002:

Address	APN	Tract	Block	Lot
1725 Ivar Avenue	5546005016	Hollywood	20	FR 16 (north portion)
1729 Ivar Avenue	5546005016	Hollywood	20	FR 17
1735 Ivar Avenue	5546005019	Hollywood	20	FR 17
1741 Ivar Avenue	5546005019	Hollywood	20	FR 18

1743 Ivar Avenue	5546005019	Hollywood	20	FR 19
1747 Ivar Avenue	5546005026	Hollywood	20	FR 20
None	5546005027	Hollywood	20	FR 20
None	5546005026	Hollywood	20	FR 21
1761 Ivar Avenue	5546005027	Hollywood	20	FR 21
None	5546005027	Hollywood	20	FR 22
1763 Ivar Avenue	5546005022	Hollywood	20	FR 22
None	5546005022	Hollywood	20	FR 23
None	5546005024	Hollywood	20	FR 23
1769 Ivar Avenue	5546005023	Hollywood	20	FR 23
6364 Yucca Street	5546005025	Hollywood	20	FR 24
6344 Yucca Street	5546005024	Hollywood	20	FR 24
1777 Ivar Avenue	5546005023	Hollywood	20	FR 24

9. Recommended: The following properties will be corrected from Hollywood CPIO Regional Center Subarea RC2 to CPIO Regional Center Subarea RC3. The lots listed below are moved from Subarea 1002 to Subarea 1003:

Address	APN	Tract	Block	Lot
6380 W Hollywood Boulevard	5546008001	Wilcox Tract	None	1
6378 W Hollywood Boulevard	5546008002	Wilcox Tract	None	2
6370 W Hollywood Boulevard	5546008003	Wilcox Tract	None	3
6360 W Hollywood Boulevard	5546008019	TR 3431	None	1
6358 W Hollywood Boulevard	5546008020	TR 3431	None	2
6352 W Hollywood Boulevard	5546008021	TR 3431	None	FR 3

10. Recommended: The following properties will be corrected from Hollywood CPIO Regional Center Subarea RC2 to Hollywood CPIO Regional Center Subarea RC1B. The following lots listed below are moved from Subarea 1002 to Subarea 1001:

Address	APN	Tract	Block	Lot
1641 N Ivar Avenue	5546008022	TR 3431	None	FR 4
1607 N Ivar Avenue	5546008018	Wilcox Tract	None	FR 24
1603 N Ivar Avenue	5546008017	Wilcox Tract	None	FR 23

11. In addition to the corrections to the Regional Center Subareas, the two illustrative maps for Figure V-4: Character Residential Density Base and Bonus are out of the order.

Figure V-4 shall be amended to switch the map adjacent to the word “Base” with the map adjacent to the word “Bonus” and switch the map adjacent to the word “Bonus with the map adjacent to the word “Base.” Legends for the maps shall remain in place.

Exhibit E (Proposed General Plan Land Use and Zone Change Maps and Matrices; Street and Network Classifications; Circulation Map; Symbols; Footnotes; and Corresponding Zone-Land Use Nomenclature Changes)

12. Recommended: Amend the Land Use and Zone Change and Q & D Matrices in Exhibit E to reflect those boundary adjustments to Subareas 1000, 1001, 1002 and 1003 to Exhibit D in paragraphs 7, 8, 9 and 10 above.

13. Optional: To remove a 36-foot height limitation, and an MR1 use limitation applied to a 150-foot depth frontage of Santa Monica Boulevard in the Theatre Row vicinity (between McCadden Place, and Lillian Way), the following change to zoning Qualified “Q” Conditions can be made. Comments submitted by studio operators within this area, specifically on the block bounded by Santa Monica Blvd., Seward St., Romaine St., and Las Palmas Ave. (i.e. Sunset Las Palmas Studios), questioned the need for the 36-foot height limit, and conveyed that it could ultimately be a detriment to entertainment and production uses, noting that even a single-story sound stage would likely exceed 36 feet in height. It is noted that the subject property does not contain a live equity theater, and is an operating entertainment production studio, and that the continuation and growth of studio uses is desired within this area.

Amend Zoning Subarea 40:1B to read:

3. For properties fronting Santa Monica Boulevard between McCadden Place and Lillian Way, which is located within Theatre Row, ~~the following shall also apply within 150 feet of the property line along Santa Monica Boulevard:~~

- ~~a) Only Live Equity Theaters and MR1 uses shall be permitted.~~
- ~~b) No building or structure shall exceed a height of 36 feet above grade.~~

e) a) No additional new off-street automobile parking shall be required when a change of use is made for new Live Equity Theaters along Theatre Row. Live Equity

Theaters provide 99 seats or fewer and host live theatrical productions, such as plays and musicals. The existing required number of off-street automobile parking spaces prior to the change of use to Live Equity Theaters shall be maintained, unless the change of use results in a reduction of required off-street automobile parking spaces. Live Equity Theaters shall not be exempt from bicycle parking requirements.

d) b) Uses. No Automotive Use or Automotive Repair shall be permitted including automobile and trailer sales (new and old), any business used for the rental or retail sale of new or used parts for motor vehicles, automobile display rooms, automotive repair establishments, automotive fueling and service stations, automotive painting, automotive upholstery, automobile laundry and wash racks, automotive exhaust test stations, automobile storage areas, and drive-through establishments.

Definitions. For purposes of the [Q] Qualified Condition, the following words and phrases are defined:

a) Automotive Use. The primary sale of used automobiles. In addition, this phrase shall include automotive repair and automobile and trailer sales area, as defined in this section.

b) Automotive Repair. A use involving the diagnosing of malfunctions, repairing or maintaining of motor vehicles. Included in this definition are body shops, paint shops, tire stores, muffler shops, auto electric shops, van conversions, lubrication centers, auto-sound shops, auto-alarm shops, auto upholstery shops, wheel alignment shops and other similar automotive related repair or installation businesses; automotive repair does not include automotive fueling and service stations as defined in this section and installers of automotive telecommunication devices and computers.

Exhibits C and E

14. Recommended: To remove one property that was misidentified as Open Space and substitute the correct property to be identified as Open Space the following revision is being made:

A correction to one of the Assessor Parcel Numbers (APN) as a property receiving a proposed change from Minimum Residential and RE40-1-H-HCR zoning designation to Open Space and OS-1XL zoning designation. The hearing notice included the APN 5567-029-026, which is incorrect, and shall be removed from the proposed Subarea 108 change to Open Space land use designation and OS-1XL zoning. The correct APN is 5567-029-027 and is added to Subarea 108. This property is owned by the Laurel Canyon Land Trust, and is intended for open space conservation purposes.

Exhibits B, C and E

15. Recommended: To update the nomenclature of the Commercial Manufacturing land use designation, the following revision is being made:

From time to time, General Plan Land Use Designation nomenclature changes are made to better reflect the priorities and needs of the Department's vision for the City's future development.

In Exhibit B, C and E, all references to "Commercial Manufacturing" shall be changed to "Commercial Industrial."

Staff Recommendation Report – Recommended Actions

16. Optional: If the CPC modifies City Planning's recommendations as noted in the Staff Recommendation Report, particularly if the recommended modifications would increase development potential, consider a modification to Recommended Action No. 4 as follows:

Find the City Planning Commission has reviewed the Draft EIR and the Recirculated Draft EIR (City EIR No. ENV-2016-1451-EIR and State Clearinghouse No. 2016041093), as shown in Exhibit H, and direct staff to take all steps, including additional analysis or procedures, as necessary to comply with CEQA prior to transmittal of CPC recommendations to the City Council.

100+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

Honorable Members of the Planning Commission,

I urge the City to update the proposed Hollywood Community Plan, which does little to address the environmental challenges all of us face. Hollywood is at the crossroads of some of the region's best transit access and some of the most development, but the plan does little to promote more sustainable development or transit access.

The proposed plan contains NO environmental mitigations, the section is literally left blank. I urge that we do what is right and make Hollywood a leader in sustainability. Developers seeking zoning concessions should be required to at very least provide lead LEED Gold Standards, no natural gas hookups and transit incentives for employees. I am disappointed that Councilmember O'Farrell, Chair of the Energy, Climate Change, Environmental Justice and River Committee is not pushing for climate justice in Hollywood and has yet to support the Just Hollywood Plan. Please stand with Sierra Club, the Sunrise Movement, and Food and Water Watch and Support a Just Hollywood, for our climate!

**20+ CONSTITUENTS
SUBMITTED THE
FOLLOWING STATEMENT
FOR YOUR
CONSIDERATION:**

Honorable Members of the Planning Commission,

Item No. 6, CPC-2016-1450-CPU.

Hello,

I am writing to let you know I am in support of the up-dated Hollywood Plan.

I would like you to expand the definition of Middle Income Housing to support our young working professionals. I would like to support those professionals in the income range from 80K-100K.

Many thanks

150+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

Honorable Members of the Planning Commission,

We need a HOTEL CONDITIONAL USE PERMIT, appealable to Council to protect our community from hotel overdevelopment. Councilmember O'Farrell's district has lost over 1300 Rent Stabilized housing units during his term in office, while Hollywood has been hit by a huge luxury commercial development boom. Councilmember O'Farrell has failed to respond to the concerns of the community, and as a result the proposed Hollywood Plan is a gentrification plan that benefits luxury commercial developers.

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. Don't Undermine Housing : Don't allow increased base zoning rights, which allow commercial development to crowd out housing. Instead, create bonus FAR for housing only. Do not increase FAR to 4.5, keep base FAR where it is.
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.

10+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

Honorable Members of the Planning Commission,

1) We need more homeless housing options in the community. Any open city-owned lots or unused structures on city-owned property needs to be designated for homeless shelters.

2) Any proposed projects that will be developed on a site where tenants currently live needs to require a right of return for the tenants into a newly constructed unit. The developers must also pay the difference in rent during the time of construction to make sure that tenants don't become homeless while the construction is happening.

3) There must be a requirement for very low-income and extremely low-income housing to be built in the area. We don't need to incentivize it, we need to demand it. We need at least 35% of all new developments to provide housing at the lowest end of the income spectrum.

4) We need more protections for our older structures. We need to preserve our history, which is the reason why people want to live in Hollywood.

March 10, 2021

Doug Haines
P.O. Box 93596
Los Angeles, CA 90093

City of Los Angeles, City Planning Commission
200 N. Spring St., 2nd Floor
Los Angeles, CA 90012

RE: City Planning Department oversight of the Hollywood Redevelopment Plan Area.

President Millman and Honorable Commission members:

The City Planning Department has assumed the authority of the planning unit of the Community Redevelopment Agency. With that authority comes a responsibility to enforce all provisions of the redevelopment plans, including aesthetic requirements.

Note below a photo of a recently completed residential apartment complex in the 5700 block of Lexington Ave. This apartment building is in the Hollywood Redevelopment Plan Area.



The Hollywood Redevelopment Plan requires that the design of new construction be compatible with the built environment. How is this new building in any manner consistent with the existing streetscape?

Buildings such as these are not only an affront to the senses, but they stand as a stark reminder of the city's failure to sustain its rich architectural legacy. Buildings such as these also promote slums, as they serve as a visual beacon to others that it's okay to construct the cheapest structures possible in our historic neighborhoods.

The people of Los Angeles deserve better than this.

Thank you.

Doug Haines



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>

March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update (“Plan”) and the draft Community Plan Implementation Overlay (“CPIO”) released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021. My name is Chase Gordon and I am a representative of Gordon California Properties, LLC, regarding the property at 1430 N. Cahuenga Boulevard, a building that has been in our family for over seventy (70) years.

We are encouraged by the progress being made on the Plan and look forward to continued engagement with the City on the revisions and ultimate approval. We understand that the CPIO reflects feedback the City received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood’s success. In particular, we were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding certain changes and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO (“August CPIO”) throughout the Regional Center, as well as the following:

- Increase the base from 3:1 to 4.5:1 FAR with a maximum bonus FAR of 6.75:1 within the RC1B zone;
- Modify the affordability levels required in Level 2 Incentive in the Affordable Housing Incentive Bonus outlined in Section II-4.B of the CPIO to (1) be on a sliding scale based on AMI level, rather than a flat percentage; (2) permit additional FAR beyond the maximum bonus of 6.75:1 FAR; and (3) allow inclusion of workforce, moderate-income, or above-moderate income housing;

- Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives;
- Including an incentive to reduce open space as part of the Additional Incentives, as previously included in the August CPIO; and
- Assuming City Planning Commission rejects the above requests, requiring the preparation of an economic study justifying the reduction of the FAR in the Regional Center area.

A. Baseline FAR Proposed in the August Plan Should be Preserved

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood’s commercial corridors and should be further incentivized. A major criticism by community groups is the demands that many projects make to remove restrictions, change zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood. We believe the proposed updates in February 2021 were responsive to this vision of Hollywood.

The reduction of the base FAR 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 As discussed above, a base FAR of 3:1 alone would not provide enough incentives for developers to apply for the highest permissible density under the Plan.

By reverting to the higher base FAR of 4.5:1 proposed in the August CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City’s much-needed housing stock, but also provide job-generating uses near public transit that align with the City’s current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. The HCPU2 describes the Regional Center as “a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services.”² By allowing more people to live and work in an area with

¹ Draft Plan (February 2021), pp. 3-21. Goal LU9.

² Draft Plan (February 2021), pp. 1-10.

public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan's objectives.

Finally, higher-intensity developments as allowed by the higher base FAR of 4.5:1 provide more opportunities for developers to contribute to solving the City's general housing shortage. Today, it is common knowledge that many Angelenos do not meet the income limits and thus do not qualify for the affordable housing, yet are nevertheless burdened by California's high housing costs. An increase of the base FAR to 4.5:1 and inclusion of incentives for workforce, moderate, and above moderate incomes would allow developers the opportunity to create a diverse range of housing options that would fit the needs of all Angelenos. A good balance of housing at various income levels is needed to provide additional workforce housing and moderate-income housing, which is vital to the revival of the local economy in Hollywood and the City at large post Covid-19.

B. The Bonus Incentives Should be Revised to Allow for More Flexibility

As stakeholders in Hollywood, we appreciate the City's vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.

The inflexibility proposed as part of the CPIO will cause many housing development projects in Hollywood to not be economically feasible with a base FAR of 3:1, so in practice less units will be constructed, including affordable housing units. Developers rely on market-rate units, commercial spaces, waivers (including reduction in open space) to offset the costs of building affordable units, thus the mix of affordable units and market-rate units must be carefully balanced in order to incentivize the maximum amount of residential density. A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

Los Angeles City Planning Commission
March 11, 2021
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For the reasons mentioned above, we urge the City Planning Commission to incorporate our suggested amendments and revert to the 4.5:1 base FAR within the RC1B area to put Hollywood on a path of renewed growth and prosperity that would work for everyone in the community.

Respectfully,

A handwritten signature in black ink, appearing to read 'A. Chase Gordon', with a large, sweeping flourish extending to the right.

A. Chase Gordon
Gordon California Properties

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

March 15, 2021

VIA EMAIL

cpc@lacity.org

priya.mehendale@lacity.org

City of Los Angeles Planning Commission
200 N. Spring Street
Los Angeles, CA 90012
Attn: Priya Mehendale, Sr. City Planner

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

Dear Ms. Mehendale:

On behalf of Hudson Pacific Properties (“Hudson”), the owner of Sunset Las Palmas Studios (the “Studio”), we submit this letter to provide additional information to address how the Draft Hollywood Community Plan Update (“Community Plan”) would impact the Studio located at 1045 N. Las Palmas Avenue (Subarea 40:1B). In our letter to the City Planning Commission dated February 17, 2021, (copy provided as Attachment 1 to this letter), we explained how the proposed 36-foot height limit for buildings fronting Santa Monica Boulevard between McCadden Place and Lillian Way would affect the future modernization of the Studio.

Hudson supports the proposed land use goal of the Community Plan to support the growth of media-related and entertainment-related uses in Hollywood, as well as the proposed policies to promote investment in the establishment, expansion and modernization of media, entertainment and creative office uses, including Hollywood’s studio facilities, in order to create high-paying jobs. A number of the proposed changes to the development standards applicable to the Media/Entertainment subareas would facilitate these goals and policies, including the proposed 3:1 FAR for projects with media-related uses. However, the proposed change to limit building height to 36 feet within 150 feet of Santa Monica Boulevard is not consistent with these goals and policies.

The Studio is comprised of a collection of production stages, support buildings and bungalows. (Refer to the figures at Attachment 2.) Currently, however, the 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 production demands of our tenants in the television and film industry require studio production stages and buildings that are significantly taller than 36 feet. (Notably, existing sound stages 10 and 11 at the Studio property exceed 36 feet in height.) Therefore, to modernize the Studio to meet the current demands of the industry, Hudson will either have to develop a few new buildings that are taller in height or develop a greater number of buildings that are less than 36 feet in height. In order to preserve existing buildings at the Studio property, some that are many decades-old and may potentially contribute to a future historic district,

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Hudson would prefer to develop a handful of new buildings that are taller than 36 feet in height along Santa Monica Boulevard.

Thus, to allow for flexibility in the future to construct a major new creative office building and production facilities at the Studio, we request a modification to the [Q]M1-2D-SN Zone proposed for Subarea 40:1B 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 developed along Santa Monica Boulevard that are taller than 36 feet.

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/ysr
Attachments

cc: Ms. Linda Lou, City Planner (w/Attachments)
(Via E-Mail) linda.lou@lacity.org
Mr. Michael Phillips (w/Attachments)
(Via E-Mail) mphillips@hudsonppi.com
Mr. Chris Pearson (w/Attachments)
(Via E-Mail) cpearson@hudsonppi.com

ATTACHMENT 1

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 17, 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: CPC-2016-1450-CPU and ENV-2016-1451-EIR: 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 (“SBS”) 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

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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,



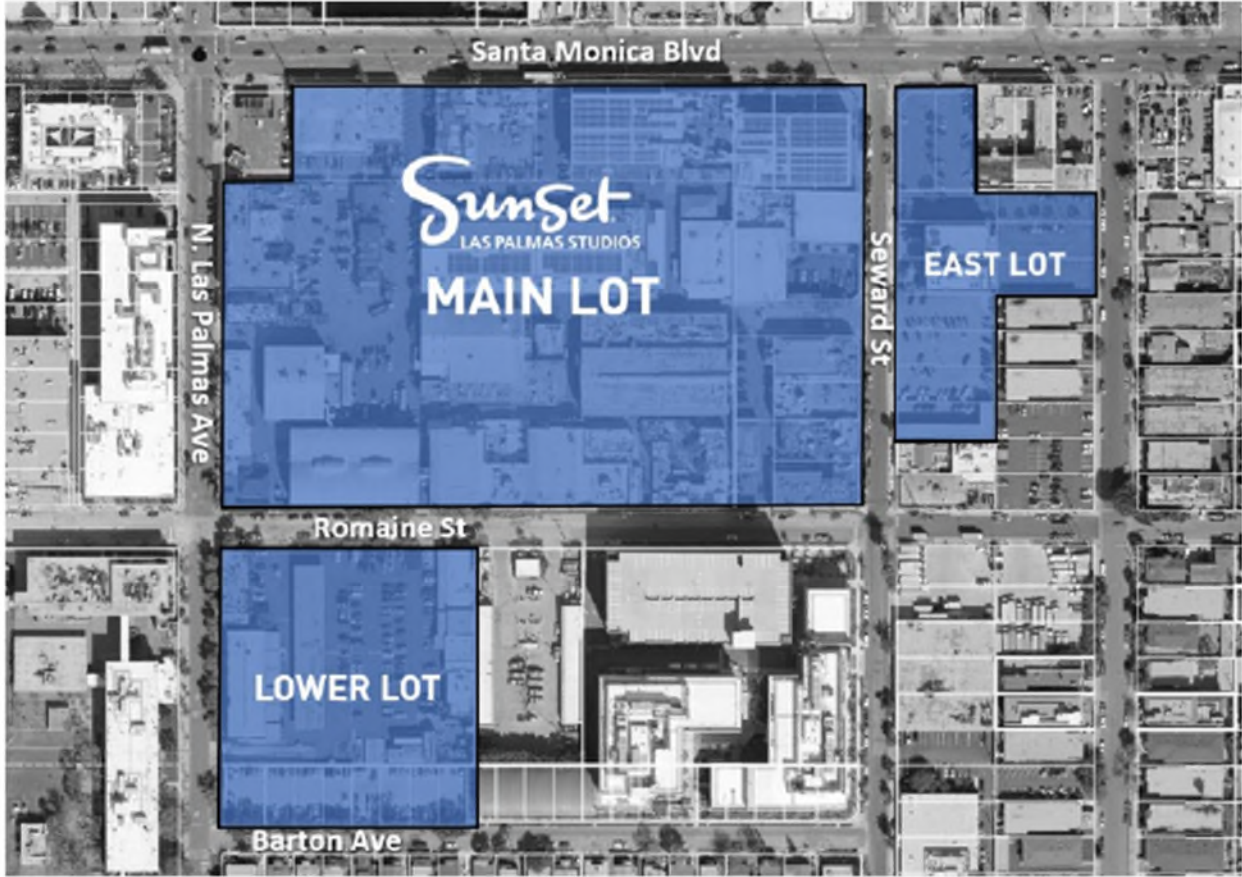
Edward J. Casey

EJC:dte

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

ATTACHMENT 2

ATTACHMENT 2





Planning CPC <cpc@lacity.org>

Hollywood Community Plan update

Villarreal, William M. <billv@dolby.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Mon, Mar 15, 2021 at 10:29 AM

To whom it may concern,

The comments below have been separately submitted to others in the City Planning Office and to Ms Nithya Raman and others in her office.

Based on information I've read, Nithya Raman wrote a letter which is asking to lift building height restrictions in Los Feliz to allow commercial developers to come in and build large commercial/residential complexes. Ms. Raman did not consult the community and the general consensus is, we are against lifting these restrictions. The Los Feliz Village area residents and visitors support small business owners in a walking neighborhood setting. Allowing big developers to come in and develop high-rise commercial/residential properties will destroy the century old character of this historic Los Angeles neighborhood. Please do not consider Ms Raman's letter as representative of the community's opinion – it is not.

Thank you,

Bill Villarreal

[2264 Ben Lomond Dr](#)

[LA, CA 90027](#)

213-706-1406



March 16, 2021

Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012
Via Email: cpc@lacity.org
hollywoodplan@lacity.org

Re: Hollywood Community Plan Update, CPC-2016-1450-CPU, ENV-2016-1451-EIR
Urge Adoption of Fire Safety Policies\Scenic Corridor & Open Space Protections

Honorable City Planning Commissioners:

The Brentwood Alliance of Canyons & HillSides (BACH)¹ submits these comments in response to the Hollywood Community Plan Update. We are concerned by (1) the insufficient wildfire risk analysis for the hillside areas and (2) the adverse impacts that the update will likely have on scenic resources and open space protections in the hillsides. We believe that these hillside issues have not been adequately addressed in either the Hollywood Community Plan (HCP) Update or the Draft Environmental Impact Report for the Hollywood Community Plan (DEIR). We request that the City Planning Commission address these deficiencies and, in doing so, incorporate the following policies as part of the HCP Update.

The Risk of Wildfire in the HillSides

Wildfire Safety

The DEIR concludes that HCP impacts related to wildfire hazards are less than significant. While the DEIR acknowledges the risk of wildfires in sections of the Santa Monica Mountains within the HCP area, it downplays the additional fire-related risks associated with hillside development or buildout. (Impacts 4.8-8 – Wildfire Hazards, DEIR page 4.8-45.)

The Attorney General has emphasized the need for local authorities to consider wildfire risks in fire-prone areas such as the Hollywood Hills: “In the wake of the State’s deadliest wildfires in 2018, the destructive wildfires of 2019, and the increased occurrence of fires anticipated throughout the State in coming years, it is particularly important that local jurisdictions carefully review and consider new development in fire-prone areas. This is particularly important for new developments proposed in

¹ BACH is an alliance of homeowner and residential associations located in the Santa Monica Mountains founded in response to the growing threat of climate change and unprecedented risk of wildfire due to continued development encroaching on and within the fragile Santa Monica Mountains ecosystem. BACH members support and promote sustainable communities, habitat, wildlife connectivity, open space, trails, public safety, and the urban tree canopy.

the wildland-urban interface...” He goes on to say, “It is well-accepted that building in the wildland areas increases the risk of fires.”²

The risks here are obvious, and are acknowledged in Planning’s own document: “Hollywood Community Plan Update, Climate Conversations.” The document was distributed by Planning during a Hollywood Community Plan Open House in 2020. As shown below, the document depicts a flame alongside the following textual information, “Destructive Wildfires: Severe droughts and increased development in wildland-urban interface areas have led to more frequent and destructive fires.” Yet despite Planning’s clear acknowledgment of the risks, none of the “Proposed Hollywood Strategies to Fight Climate Change” listed beneath the diagram suggest implementing fire-safe policies as part of the HCP update. (See 2020 Open House board, attached.)



DESTRUCTIVE WILDFIRES

Severe droughts and increased development in wildland-urban interface areas have led to more frequent and destructive fires.

The establishment of effective policies for wildfire protection in very high fire hazard severity zones is a matter of citywide concern. The City should adopt objectives and policies based on the goals, data, and analysis identified for the protection of lives and property from the catastrophic risk of wildfire as part of the HCP update. These objectives and policies should take into consideration the following:

- Vegetation management
- Defensible space
- Fuel modification
- Home hardening
- Five foot ember-resistant zone
- Fire risk mapping
- Fire safety plan
- Local hazard mitigation plan: climate adaptation and resiliency strategies
- A vulnerability assessment identifying the impacts of climate change
- Historical data on natural events and hazards, including locally prepared maps of areas subject to previous risk, areas that are vulnerable, and sites that have been repeatedly damaged

² Hon. Xavier Becerra, Cal. Attorney General, letter to San Diego County on the Otay Ranch Resort Village Project, December 27, 2019. See also PNAS, Rapid Growth of the US Wildland-Urban Interface Raises Wildfire Risk (Feb. 6, 2018) (<https://www.pnas.org/content/pnas/115/13/3314.full.pdf>); New York Times, Climate Change Is Fueling Wildfires Nationwide, New Report Warns (Nov. 27, 2018) (<https://www.nytimes.com/interactive/2018/11/27/climate/wildfire-global-warming.html>); Scientific American, Living on the Edge: Wildfires Pose a Growing Risk to Homes Built Near Wilderness Areas (June 1, 2018)

- Minimum roadway standards for concurrent ingress and egress
- Emergency evacuation route redundancy
- Evacuation assessment plan/modeling
- Roadway capacity analysis
- Prohibition on new development in VHFHSZ
- Adaptation and resilience goals, policies, and objectives
- Feasible implementation measures

CEQA Analysis of Wildfire Risks

Environmental Assessment

The Supreme Court has emphasized the need and requirement for CEQA review of potentially significant impacts in areas subject to hazardous conditions such as wildfires. “CEQA calls upon an agency to evaluate existing conditions to assess whether a project could *exacerbate hazards that are already present*.” (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 388 [emphasis added].) On that basis, the Court upheld the validity of Guidelines section 15126.2(a), providing that an “EIR shall also analyze any significant environmental effects the project might cause by *bringing development and people into the area affected*. . . . Similarly, the EIR should evaluate any potentially significant impacts of locating development in other *areas susceptible to hazardous conditions* (e.g., floodplains, coastlines, *wildfire risk areas*) as identified in authoritative hazard maps, risk assessments or in land use plans, addressing such hazards areas.’” (*Ibid.*, quoting Guidelines § 15126.2(a).)

The Attorney General has likewise made clear that a thorough environmental analysis of wildfire risks in designated very high fire hazard severity zones is required under CEQA: “[L]ocating development in a very high fire hazard severity zone will itself increase the risk of fire and, as a result, increase the risk of exposing residents, employees, and visitors to that enhanced risk. . . . [T]he DEIR fails to analyze the increased risk of wildfire that will result from siting the Project within such a zone.”³

As with the project referred to in the AG’s letter, allowing new development in hillsides within the HCP area will itself increase the risk of fire and expose communities to increased danger. In recognition of such risks, a December 2018 Update to the CEQA Guidelines added provisions addressing wildfire impacts to implement Public Resources Code section 21083.01. The updated CEQA Guidelines directs lead agencies to analyze the impact of a project on wildfire risk. (Cal. Code Regs., tit. 14, §§ 15000 et seq.)⁴

³ Hon. Xavier Becerra, Cal. Attorney General, letter to San Diego County on Otay Ranch Resort Village Project, November 12, 2020.

⁴ The scope of analysis on wildfire risk was codified and clarified in the CEQA Guidelines, but it is not a new requirement. (See *S. Orange Cnty. Wastewater Auth. v. City of Dana Point* (2011) 196 Cal.App.4th 1604, 1616 [“A true example [of an impact associated with bringing development to a hazard] with respect to, say, wildfires would be increasing the risk in a fire-prone area by people using their fireplaces or their backyard barbecues or by children playing with matches.”]) Specifically, wildfire-related impact thresholds include: (1) whether a project would “expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires” and (2) whether it would, “due to slope, prevailing winds, and other

The Natural Resources Agency “drafted the questions in the [CEQA Guidelines] new wildfire section to focus on the effects of new projects in creating or exacerbating wildfire risks.”⁵ The analysis must start by considering a project’s potential to create or increase the risk of wildfires. This is critical for hillside areas because “it is clear that development may exacerbate wildfire risks.” (*Ibid.*, note 5.) Any new or exacerbated wildfire risks due to a project must then be analyzed.

Scenic Corridors/Highways

Mobility Plan (Element of the General Plan)

The HCP document cites policy HCP P142 as a Long Term Program that will study additional highways for designation in accordance with Mobility Plan 2035’s selection criteria for scenic highways as well as preserve the designated General Plan Mobility Element scenic highways. But there is no mention of Mobility Plan guidelines that apply to scenic highways that are not located within Specific Plan boundaries to be found. To the extent Scenic Highways in the HCP area are not located within Specific Plan boundaries, Mobility Plan guidelines apply and should be included in the HCP update to ensure these policies for Scenic Highways are implemented in the community plan area and not overlooked:

Appendix B: Inventory of Designated Scenic
Highways and Guidelines (page 168, see attached)

Corridor Plans for each designated Scenic Highway should be prepared in accordance with each corridor’s individual character or concept. These Corridor Plans may be incorporated into specific plan or district plan ordinances. In the absence of such adopted Scenic Corridor Plans, the following interim guidelines are established as part of this Plan:

1. Roadway

- a. Design and alignment of a Scenic Highway roadway must include considerations of safety and capacity as well as preservation and enhancement of scenic resources. However, where a standard roadway design or roadway realignment would destroy a scenic feature or preclude visual access to a scenic feature cited in Appendix B of this Plan, design alternatives must be considered through preparation of an environmental impact report.
- b. Design characteristics such as curves, changes of direction and topography which provide identity to individual Scenic Highways shall be preserved to the maximum extent feasible.

factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire.” (CEQA Guidelines, App. G, subds. IX(g), XX(b).)

⁵ California Natural Resources Agency, Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines (Nov. 2018) at p. 87,
https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf (“CNRA Final Statement”).

2. Earthwork / Grading

- a. Grading for new cuts or fills shall be minimized. Angular cuts and fills shall be avoided to the maximum extent feasible.
- b. All grading shall be contoured to match the surrounding terrain.
- c. In order to mitigate the environmental impacts of grading in designated Hillside Areas (as depicted on Bureau of Engineering Basic Grid Map No. A-13372), maximum effort shall be made to balance cut and fill on-site.

3. Planting / Landscaping

- a. Fire-resistant native plants and trees shall be utilized in any parkway landscaping along Scenic Highways located within designated Hillside Areas.
- b. In designated Hillside Areas, where previous plant material has been washed away or destroyed (due to excessive rainfall, fire, grading, etc.) erosion-controlling plants shall be planted to prevent erosion and mud/landslides. Such Hillside parkways and slope easements shall either be hydro-seeded, or terraced and then planted, with native fire-resistant plants.
- c. Outstanding specimens of existing trees and plants located within the public right-of-way of a Scenic Highway shall be retained to the maximum extent feasible within the same public right-of-way.
- d. Low-growing ground cover and/or shrubs shall be utilized as parkway planting along Scenic Highways in order to avoid blocking a desirable view of a scenic feature listed in Appendix E of this Element. Plant material size at maturity as well as overall scale of plants within the landscaped area must be carefully studied in the site analysis and design stages.
- e. Landscaped medians of Scenic Highways shall not be removed. Such medians may be reduced in width (1) to accommodate left turn channelization within one hundred feet of a signalized intersection; or (2) to accommodate a designated Class II bikeway provided that there is compliance with Guideline 3c above, and that the resulting median width is not less than eight (8) feet.

4. Signs / Outdoor Advertising

- a. Only traffic, informational, and identification signs shall be permitted within the public right-of-way of a Scenic Highway.
- b. Off-site outdoor advertising is prohibited in the public right of-way of, and on publicly-owned land within five hundred feet of the center line of, a Scenic Highway.
- c. A standard condition for discretionary land use approvals involving parcels zoned for non-residential use located within five hundred feet of the center line of a Scenic Highway shall be compliance with the sign requirements of the CR zone.

d. Designated Scenic Highways shall have first priority for removal of nonconforming billboards or signs. Such priority extends to properties located along, or within five hundred feet of the center line of, designated Scenic Highways.

5. Utilities

a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground.

b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway.

Excess Land

First Right of Refusal

The Update fails to address the protocol for disposing of excess lands. Pursuant to Public Resource Code Section 33207(b), the City must first offer to the Santa Monica Mountains Conservancy any property in the Santa Monica Mountains Conservancy Zone that is scheduled for disposal as excess land (e.g., slivers, remnants, or surplus). The Conservancy Zone is explicitly defined in Public Resource Code section 33105.

Section 33207(b) of the Public Resources Code states in relevant part:

The conservancy shall have the first right of refusal on any property within the zone presently owned by a public agency and scheduled for disposal as excess lands, except where such lands are designated for acquisition as a park or recreation area by a federal, state, or local agency. The conservancy shall have the right to acquire such lands at the disposing agency's purchase price plus any administrative and management costs incurred by the disposing agency.

This requires that the sale of any excess land within the Santa Monica Mountains Conservancy Zone by the City, or any other public agency, must first be offered to the Conservancy no matter the property's size, characteristics, label or how it is characterized by the selling public entity.

We urge the city to include a reference to this requirement in the updated HCP to avoid the unintended consequence of selling off excess land before the Santa Monica Mountains Conservancy receives its lawful right of first refusal to acquire that land.

Conclusion

As stated in the Staff Recommendation Report, the Hollywood Community Plan's overarching objectives include the conservation of lower-scale neighborhoods; safeguarding hillside areas; promoting sustainable development; and improving public space, parks, and open spaces. To achieve these goals, the HCP update must implement additional policies to address wildfire safety,

mitigate potential wildfire impacts, preserve open space, and protect our scenic highways and corridors.

Sincerely,

Brentwood Alliance of Canyons & Hillsides:

Bel Air Skycrest Property Owners' Association
Lais Becker, Community Liaison

Brentwood Hills Homeowners Association
Eric Edmunds, President

Brentwood Residents Coalition
Wendy-Sue Rosen, President

Mountaingate Open Space Maintenance Association
Stephen Drimmer, President

cc: Councilmember Nithya Raman
Councilmember Paul Koretz
Councilmember Mitch O'Farrell

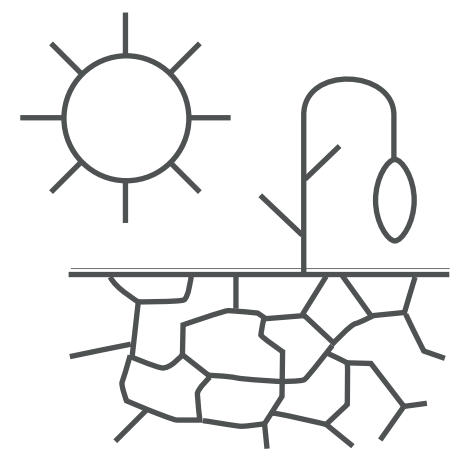
HOLLYWOOD COMMUNITY PLAN UPDATE

Climate Conversations

Cities Have the Power to Fight the Climate Crises

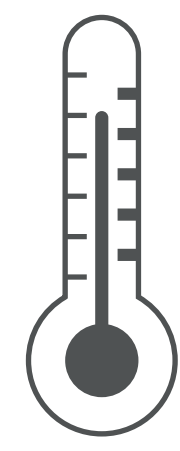
“Emissions must decline everywhere, as soon as possible. The pace may vary depending on the opportunities and characteristics of each sector, but at the end of the day, LA’s Green New Deal puts our city on the road to a zero carbon future across the board.” –Green New Deal (2019)

Climate Change is Here In Los Angeles



DROUGHT

Water sources to Los Angeles (Owens River, Colorado River, and local groundwater) are all facing challenges in pollution and have unpredictable future water supply.



EXTREME HEAT

A UCLA study on climate change projections in the Los Angeles region concludes that the number of days warmer than 95 degrees could triple in DTLA by 2050.



DESTRUCTIVE WILDFIRES

Severe droughts and increased development in wildland-urban interface areas have led to more frequent and destructive fires.



SEA LEVEL RISE

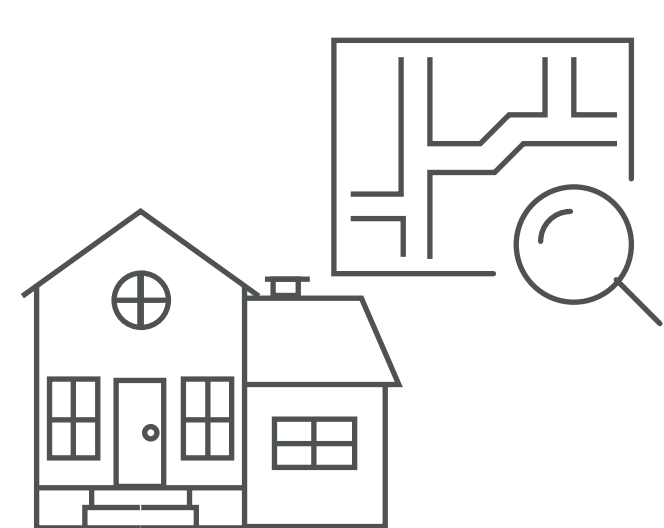
Both low and high sea level rise scenarios suggest large areas of beaches in the Los Angeles region will disappear as soon as 2030.

Climate Change Policies



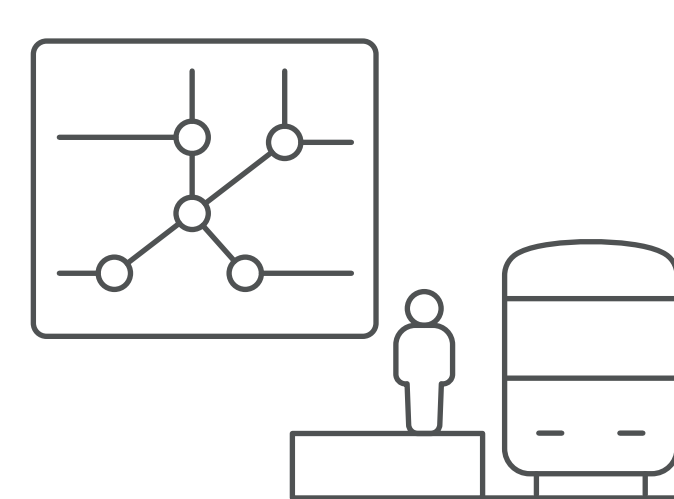
Proposed Hollywood Strategies to Fight Climate Change

LAND USE



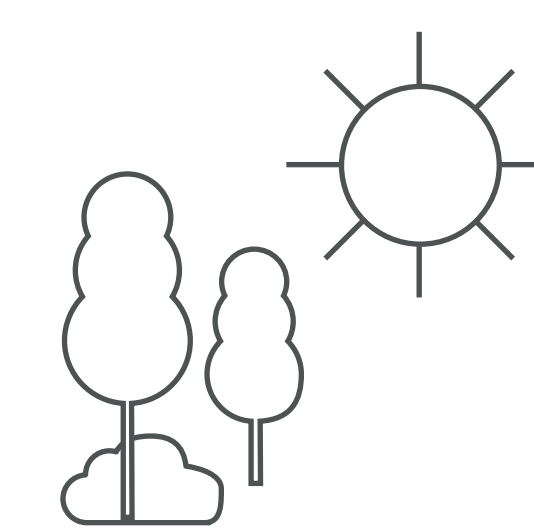
- Facilitate new housing, retail, and employment opportunities near transit systems to reduce driving and emissions, and encourage other mobility options.
- Attract pedestrian activity with urban design standards for buildings.
- Encourage adaptive reuse of historic buildings when feasible. Promote the use of energy efficient and water conserving methods and materials for green building.

MOBILITY



- Promote the existing transit system that provides convenient alternatives to driving. Hollywood is well served by Metro stations and bus lines.
- Direct future land use development (housing and jobs) to be near transit infrastructure to accommodate growth and reduce Vehicle Miles Traveled and emissions.
- Promote first/last-mile connections to the five Metro Stations through shuttles, shared rides, bicycles and mobility hubs.
- Facilitate a safe and integrated bicycle network that provides access to transit and key destinations.

GREEN SPACE

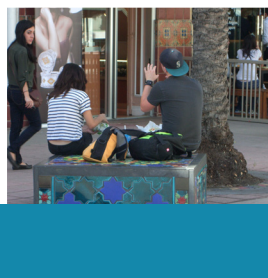


- Support the preservation and planting of trees to achieve optimum shade cover to reduce the heat island effect.
- Promote green infrastructure and green streets (e.g. bioswales, permeable pavement, and street trees) in public and private projects.
- Encourage new park opportunities for a range of types (neighborhood, community, and regional), including the Hollywood Central Park.
- Preserve passive open space areas for natural resources.



Mobility Plan 2035

An Element of the General Plan



Los Angeles Department of City Planning

Approved by City Planning Commission: June 23, 2016
City Plan Case No. CPC-2013-0910-GPA-SPCA-MS

Adopted by City Council: September 7, 2016
Council File No. 15-0719-S15

Appendix B: Inventory of Designated Scenic Highways and Guidelines

Scenic Highways Guidelines

Corridor Plans for each designated Scenic Highway should be prepared in accordance with each corridor's individual character or concept. These Corridor Plans may be incorporated into specific plan or district plan ordinances. In the absence of such adopted Scenic Corridor Plans, the following interim guidelines are established as part of this Plan:

1. Roadway

- a. Design and alignment of a Scenic Highway roadway must include considerations of safety and capacity as well as preservation and enhancement of scenic resources. However, where a standard roadway design or roadway realignment would destroy a scenic feature or preclude visual access to a scenic feature cited in Appendix B of this Plan, design alternatives must be considered through preparation of an environmental impact report.
- b. Design characteristics such as curves, changes of direction and topography which provide identity to individual Scenic Highways shall be preserved to the maximum extent feasible.

2. Earthwork / Grading

- a. Grading for new cuts or fills shall be minimized. Angular cuts and fills shall be avoided to the maximum extent feasible.
- b. All grading shall be contoured to match with the surrounding terrain.
- c. In order to negate the environmental impacts of grading in designated Hillside Areas (as depicted on Bureau of Engineering Basic Grid Map No. A-13372), maximum effort shall be made to balance cut and fill on-site.

3. Planting / Landscaping

- a. Fire-resistant native plants and trees shall be utilized in any parkway landscaping along Scenic Highways located within designated Hillside Areas.
- b. In designated Hillside Areas, where previous plant material has been washed away or destroyed (due to excessive rainfall, fire, grading, etc.) erosion-controlling plants shall be planted to prevent erosion and mud/land slides. Such Hillside parkways and slope easements shall either be hydro-seeded, or terraced and then planted, with native fire-resistant plants.
- c. Outstanding specimens of existing trees and plants located within the public right-of-way of a Scenic Highway shall be retained to the maximum extent feasible within the same public right-of-way.
- d. Low-growing ground cover and/or shrubs shall be utilized as parkway planting along Scenic Highways in order to avoid blocking a desirable view of a scenic feature listed in Appendix E of this Element. Plant material size at maturity as well as overall scale of plants within the landscaped area must be carefully studied in the site analysis and design stages.

- e. Landscaped medians of Scenic Highways shall not be removed. Such medians may be reduced in width (1) to accommodate left turn channelization within one hundred feet of a signalized intersection; or (2) to accommodate a designated Class II bikeway provided that there is compliance with Guideline 3c above, and that the resulting median width is not less than eight (8) feet.

4. Signs / Outdoor Advertising

- a. Only traffic, informational, and identification signs shall be permitted within the public right-of-way of a Scenic Highway.
- b. Off-site outdoor advertising is prohibited in the public right-of-way of, and on publicly-owned land within five hundred feet of the center line of, a Scenic Highway.
- c. A standard condition for discretionary land use approvals involving parcels zoned for non-residential use located within five hundred feet of the center line of a Scenic Highway shall be compliance with the sign requirements of the CR zone.
- d. Designated Scenic Highways shall have first priority for removal of nonconforming billboards or signs. Such priority extends to properties located along, or within five hundred feet of the center line of, designated Scenic Highways.

5. Utilities

- a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground.
- b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway.

Scenic Byways Guidelines

Guidelines for Scenic Byways designated in the Community Plans should be established as part of the Community Plan Update or Revision process, with guidelines tailored to local considerations. Such guidelines may be incorporated into the Community Plan text or into a Community Design Overlay (CDO). Guidelines for scenic byway protection and/or enhancement should consider the following aspects:

1. Roadway Design and Alignment
2. Parkway Planting / Landscaping
3. Signs / Outdoor Advertising Restrictions
4. Utilities (e.g. undergrounding of new or relocated utility facilities)
5. Opportunity for Enhanced Non-motorized Circulation



Item #6 Hollywood Community Plan/Prioritize Homes for Essential Workers over Luxury Hotels

Coleman Miller <colemanmiller@gmail.com>

Mon, Mar 15, 2021 at 1:43 PM

To: cpc@lacity.org

Cc: daniel.skolnick@lacity.org, meg.healy@lacity.org, craig.bullock@lacity.org, councilmember.ofarrell@lacity.org, paul.koretz@lacity.org, contactCD4@lacity.org

Honorable Commissioners,

Please see this editorial by Professor Peter Dreier endorsing the Just Hollywood Plan. It resonated with me - I'm currently out of work in the personal training industry and have had to get rental assistance to stay in my apartment. Please focus on the desperate need for housing, not blind speculation

<https://www.citywatchla.com/index.php/cw/los-angeles/21361-the-la-planning-commission-should-prioritize-homes-for-essential-workers-over-luxury-hotels>

The LA Planning Commission Should Prioritize Homes for Essential Workers ... Over Luxury Hotels

At its March 18th meeting, it will vote on the Hollywood Community Plan, which will set the planning rules for Hollywood for the next 20 years.

According to a recent report by the consulting firm McKinsey, only 14% of Hollywood tenants can afford a market-rate apartment, the largest affordability gap in any Los Angeles neighborhood. In the decade before the last census, Hollywood had lost 12,500 residents to gentrification. Working families, mostly Latino, were displaced by high rents and the conversion of affordable apartments to high-priced condominiums or high-end hotels. Essential workers from cooks to grocery clerks to hospital workers to garbage truck drivers simply can't afford to live in Hollywood.

The number of hotel rooms in Hollywood has quadrupled since 2000 and is on a pace to double in the next few years. The amount of office space has increased by 67% in the last decade alone. All this has come at the expense of affordable housing, which competes with these more profitable development projects.

The COVID-19 pandemic has worsened these trends and its aftermath will continue to do so unless the City takes action.

That's why a coalition of faith, housing, labor, environmental, and community organizations (including five of the area's seven neighborhood councils) have been fighting for a "Just Hollywood

Plan” that makes new affordable housing and tenant protections a priority over luxury commercial projects.

The Just Hollywood coalition was making progress until the Hollywood Chamber of Commerce and the Hollywood Partnership (a group of real estate companies previously called the Hollywood Property Owners Alliance) began a lobbying and propaganda campaign to thwart the proposed reforms. Executives for the companies that sit on the boards of these two organizations have donated over \$78,000 to Hollywood Councilmember Mitch O’Farrell, according to data from the city’s Ethics Commission.

The business moguls objected to the Just Hollywood coalition’s proposal to allow larger buildings only if their projects incorporated apartments affordable to working families and essential workers.

Instead, the business lobby groups – developers, big landlords, and large corporations – are pushing for inequitable giveaways, larger buildings with no affordable housing, or even any housing at all. At a recent hearing, developer attorney Jerry Neumann claimed that the Just Hollywood plan’s “hyperfocus on housing overlooks commercial development “ and that the area is underserved by commercial development.

This laughable contention is easily refuted by the Chamber of Commerce’s own recitation of the number of hotel rooms and office space coming on the market. Despite this, the Hollywood Chamber is demanding new rules that would more than double the size of new buildings in some of the most lucrative parts of Hollywood. Developers would be getting a huge bonanza without having to provide a reasonable number of affordable housing units. In other words, Hollywood would become ground zero for several decades of tall luxury apartment buildings, high-end hotels, and expensive office complexes, while the inventory of affordable housing would continue to plummet.

Moreover, a **new study** of Los Angeles by scholars from the Urban Institute and the University of Southern California found that policies to require developers to incorporate a significant number of affordable housing in exchange for density bonuses do *not* discourage new housing construction. In fact, they have encouraged it

The City Planning Commission has a choice to make that will determine whether Hollywood will become a wealthy enclave or an inclusive community. The Commission members should reject bad faith arguments and build upon rather than undermine LA’s successful affordable housing incentives. They should take the community’s lead and support the Just Hollywood Plan.

(Peter Dreier is a professor of politics and founding chair of the Urban & Environmental Policy Department at Occidental College. He is coauthor of The Next Los Angeles: The Struggle for a Livable City (University of California Press) and a contributor to CityWatch.)

-CW

Coleman Haygood Miller



March 16, 2021

Sent via email

Los Angeles City Planning Commission
201 N. Figueroa Street, 4th Floor
Los Angeles, California 90012
cpc@lacity.org

Re: Proposed Amendment to Hollywood Community Plan to Prohibit New Development in Designated Very High Fire Hazard Severity Zone

Dear Commissioners,

On behalf of the Center for Biological Diversity (“the Center”), we are writing to urge that the Hollywood Community Plan Update (“the Plan”) include a prohibition on new development in the portions of the plan area that are a designated “Very High Fire Hazard Zone.” Further development in this zone would result in loss of native biodiversity and increased wildfire risk while providing no benefits to current residents. Further development in these areas also contradicts Mayor Eric Garcetti’s commitment to the Green New Deal, which envisions a more sustainable city that protects the environment, reduces greenhouse gas emissions, and provides equal access for all communities to open space.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles.

Amendments to the Plan that address the risk of wildfire and prioritize community health by restricting new development in these very high fire hazard areas will bring Los Angeles closer towards a safer coexistence with wildfires. Although wildfires are a natural and necessary process in many of California’s ecosystems, historical fire regimes have been dramatically disrupted in recent history by European colonization, development, logging and fire suppression.

As outlined in the Center’s recent report, “Built to Burn: California’s Wildlands Developments Are Playing with Fire” (the “Wildfire Report”),¹ development in high fire-prone

¹ Center for Biological Diversity, “Built to Burn: California’s Wildlands Developments Are Playing With Fire

wildlands is leading to more human-caused ignitions where people live (Radeloff et al. 2018). Nearly all contemporary wildfires in California are caused by human sources such as power lines, car sparks, cigarettes, and electrical equipment (Syphard et al. 2007; Balch et al. 2017). Building new developments in high fire-risk areas increases unintentional ignitions and places more people in danger. Since 2015, almost 200 people in the state have been killed in wildfires, more than 50,000 structures have burned down, hundreds of thousands have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and air pollution.²

Rampant sprawl development in fire-prone wildlands has also contributed to a dramatic increase in costs due to fire-suppression and damages. Costs in areas managed by Cal Fire were \$23 billion during the 2015-2018 fire seasons, which is more than double the wildfire cost for the previous 26 years combined after adjusting for inflation. Fifteen of the 20 most destructive California wildfires have occurred in the past five years.³

Very high fire hazard severity zones and state responsibility areas have been identified by Cal Fire as areas that are likely to burn within 30 to 50 years.⁴ And hotter, drier and windier conditions due to climate change make the landscape more conducive to wildfire ignitions and spread.

In addition to the economic damage, public health impacts and human loss of life, altered wildfire regimes are degrading native habitats that many endangered and threatened plants and animals rely on. In California chaparral and sage scrub ecosystems, increasing fire frequency due to development is converting these shrublands into non-native grasses that burn more easily, leading to a dangerous “feedback loop” of increasing fire and degraded ecosystems (Keeley 2005; Syphard et al. 2018).

Unnaturally frequent wildfire in native shrublands can harm vulnerable native species already reeling from the impacts of habitat loss and fragmentation. Several Southern California mountain lions in the genetically compromised Santa Monica and Santa Ana populations have died in recent wildfires because they were unable to escape to safety due to surrounding roads and development. And post-fire landslides threaten already-imperiled amphibians and fish such as the mountain yellow-legged frog and unarmored threespine stickleback.

Given the well-known impacts of siting new development in fire-prone areas, the Plan’s Environmental Impact Report’s (“EIR”) assertions and analysis of wildland fires are not supported by evidence. In particular, the EIR asserts that because development opportunities are “limited” and will comply with existing Fire Department requirements, then impacts will be less than significant and no mitigation is required. (EIR at 4.8-45.) Contrary to this assertion in the EIR, any new development in a very high fire hazard severity zone has the potential to cause a

(Feb. 2021), available at <https://www.biologicaldiversity.org/programs/urban/pdfs/Built-to-Burn-California-Wildfire-Report-Center-Biological-Diversity.pdf>.

² CAL FIRE Incidents. CAL FIRE (2015-2020), Accessed, March 15th, 2021. <https://www.fire.ca.gov/incidents>

³ CAL FIRE Statistics and Events (2015-2018), Accessed March 15th, 2021. <https://www.fire.ca.gov/stats-events/>

⁴ California Fire Hazard Severity Zone Viewer. California State Geoportal, Accessed March 15th, 2021. <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>

significant impact, as described in the numerous scientific studies referenced in the Wildfire Report. In addition, as the Wildfire Report notes, even homes built to current standards are not fireproof, and more human uses has the potential to cause additional unintentional ignitions. As a result, the EIR's claim that no mitigation measures are required is improper. These gaps and inconsistencies within the EIR violate the California Environmental Quality Act's mandate that an EIR contributes to informed decision-making.

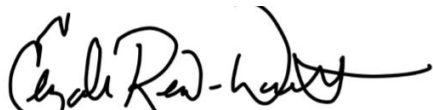
The Center urges the Plan be revised to include a policy that no new residential dwelling or commercial, retail, or industrial uses shall be permitted in areas in the Plan designated as a very high fire hazard severity zone. Only after doing so can the City of Los Angeles assure the public that the Plan does not in fact have significant new wildland fire impacts. Adopting such a policy would prioritize human health and safety as well as the protection of the City's biodiversity.

Thank you for your consideration of these comments.

Sincerely,



J.P. Rose
Urban Wildlands Staff Attorney
Center for Biological Diversity
660 S. Figueroa Street #1000
Los Angeles, CA 90017
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jrose@biologicaldiversity.org



Elizabeth Reid-Wainscoat
Urban Wildlands Campaigner
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References Cited

- Balch, J. K., Bradley, B. A., Abatzoglou, J. T., Nagy, R. C., Fusco, E. J., & Mahood, A. L. (2017). Human-started wildfires expand the fire niche across the United States. *Proceedings of the National Academy of Sciences*, *114*(11), 2946–2951.
- Keeley, J. E. (2005). *Fire as a threat to biodiversity in fire-type shrublands. Planning for biodiversity: bringing research and management together. USDA Forest Service General Technical Report PSW-GTR-195.*
- Radeloff, V. C., Helmers, D. P., Kramer, H. A., Mockrin, M. H., Alexandre, P. M., Bar-Massada, A., ... Stewart, S. I. (2018). Rapid growth of the US wildland-urban interface raises wildfire risk. *Proceedings of the National Academy of Sciences*, *115*(13), 3314–3319.
- Reid, C. E., Jerrett, M., Tager, I. B., Petersen, M. L., Mann, J. K., & Balmes, J. R. (2016). Differential respiratory health effects from the 2008 northern California wildfires: A spatiotemporal approach. *Environmental Research*, *150*, 227–235.
- Syphard, A. D., Brennan, T. J., & Keeley, J. E. (2018). Chaparral Landscape Conversion in Southern California. In *Valuing Chaparral* (pp. 323–346).
- Syphard, A. D., Radeloff, V. C., Keeley, J. E., Hawbaker, T. J., Clayton, M. K., Stewart, S. I., ... Hammer, R. B. (2007). Human influence on California fire regimes. *Ecological Society of America*, *17*(5), 1388–1402.

March 15, 2021

Doug Haines
P.O. Box 93596
Los Angeles, CA 90093

City of Los Angeles, City Planning Commission
200 N. Spring St., 2nd Floor
Los Angeles, CA 90012

RE: Residential vacancy rates in the Hollywood Community Plan Update area. Commission hearing scheduled for March 18, 2021.

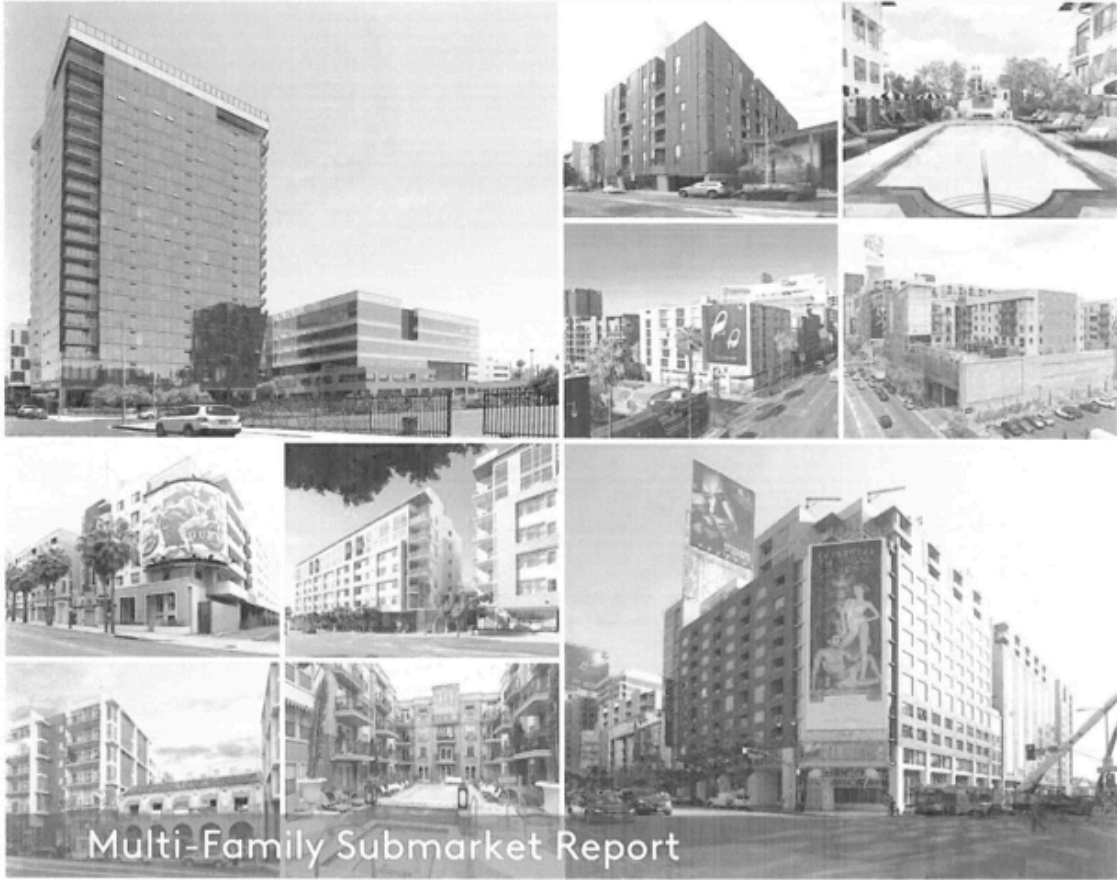
President Millman and Honorable Commission members:

I noted in my comments during the commission's February 18, 2021 hearing on the proposed Hollywood Community Plan Update that Hollywood has the highest residential vacancy rate in Los Angeles. I also noted that since 1990, Hollywood has experienced a declining residential population, and that the author of the 1988 Hollywood Community Plan, Fran Offenhauser, has stated that the existing Plan has a build-out under its by-right zoning of approximately 330,000 people.

I wanted to provide the commission with current factual data regarding Hollywood's residential vacancy rates. Please note the attached February 22, 2021 proprietary report from CoStar detailing Hollywood's Multi-Family Submarket. The CoStar report shows an 11% overall vacancy rate for Hollywood, with a 20.2% vacancy rate in "high-end" residential development (which is the overwhelming type of project being developed in Hollywood today).

Thank you.

Doug Haines



Multi-Family Submarket Report

Hollywood

Los Angeles - CA

PREPARED BY _____



Vacancy

Hollywood Multi-Family

The heavy pace of new construction in Hollywood will exacerbate the effects of a pandemic-driven slowdown, especially in 4 & 5 Star assets. Vacancies were already on the rise here before the outbreak, and new supply continues to outpace apartment demand. The overall submarket vacancy rate sits at 11.0%, and in high-end 4&5 Star communities vacancies have reached 20.2%.

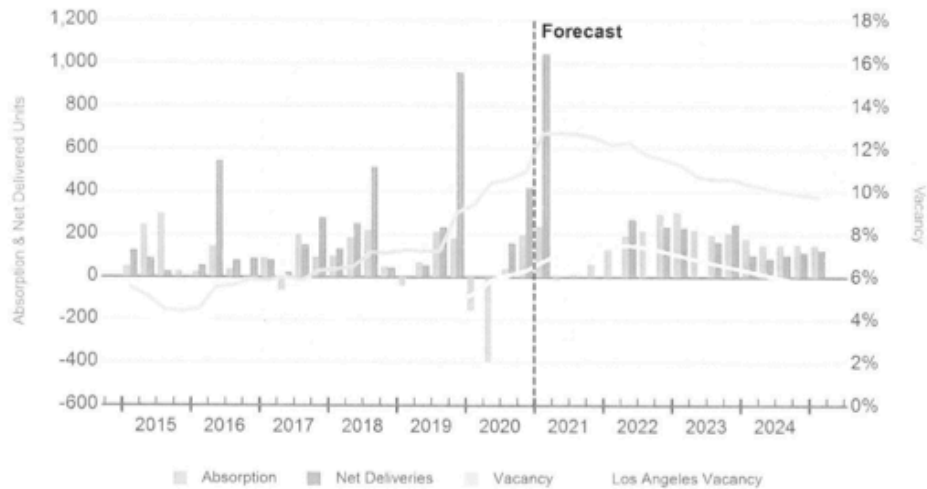
This is a densely populated area with little single-family housing. About 80% of local households are renters. That imbalance, along with the area's name recognition and central location, was an enticing draw for developers and investors before the COVID-19 outbreak.

Employment prospects in the submarket improved in the past decade as content-hungry tech companies established a foothold in the area to collaborate with Hollywood's entertainment industry. This helped jumpstart creative office development and brought new

high-paying jobs to the area. Netflix is the prime example of this phenomenon, having leased more than 1.5 million SF of office and studio space in Hollywood since 2015.

New developments are clearly targeting an affluent segment of the renter population, and high-end projects face several challenges. Luxury properties have posted the largest vacancy increases and sharpest rent losses during the pandemic as renter preferences shift. Local projects also face competition from a wave of new 4 & 5 Star communities in other central and Westside submarkets. With an explosion of luxury-apartment construction Downtown, along with heavy a heavy delivery pipeline in tech-friendly Culver City and Santa Monica, Hollywood's ability to attract and retain wealthy renters will continue to be tested even when a recovery takes hold.

ABSORPTION, NET DELIVERIES & VACANCY





Planning CPC <cpc@lacity.org>

The proposed Hollywood Community Plan and a Los Feliz HPOZ?

Elizabeth Lovins <ealovins@yahoo.com>

Mon, Mar 15, 2021 at 10:29 AM

To: "Ken.bernstein@lacity.org" <Ken.bernstein@lacity.org>

Cc: "Cpc@lacity.org" <Cpc@lacity.org>, "Chc@lacity.org" <Chc@lacity.org>

Dear Ken,

Hope this finds you well!

I know you must be very busy right now, but I have a question about the proposed Hollywood Community plan in regards to the Los Feliz HPOZ?

I'm glad the text already says that a Los Feliz HPOS is a goal. But could you kindly tell me what the specific proposed or general boundary would be? And when would this be researched and considered for HPOZ status? I'm a long time Los Feliz resident and am very interested to know.

Thanks again!

Elizabeth

--

Director, Hollywood Art Center, *since 1912*

Los Feliz Resident, *since 2003*

Fran Offenhauser Comments
2/18/21

Fran Offenhauser- professional architect, planner, real estate developer, and preservation advocate

I urge the Planning Commission to take action to make the great visions and goals in the WORDS of the Plan a reality—to actually carry through into the zoning—the parcel by parcel zoning that is actually what will get adopted by the Council.

1. I urge you to require a SINGLE READABLE Plan map—actually 2 maps—one showing the current zoning including D conditions and one showing proposed zoning.
2. I urge you to require that the computation required by the General Plan Framework before any re-zoning begins be done—what is the Plan capacity of the EXISTING Community Plan—what growth already can be accommodated without any new zoning? (These computations have been provided to City Planning—all growth anticipated even in RHNA numbers is already in the current 1988 Community Plan. Thus selecting the "no project alternative" is the environmentally superior alternative)
3. Hollywood Heritage has a Vision Hollywood 2021 Plan, and has provided you with a 5 point plan to focus on SPECIFIC FIXES for this Community Plan. Focus on enabling sustainable building adaptive re-use; filling empty buildings and protecting what already exists. We need realistic tools- not just new, new, new

Fran was cut off before giving examples

1. CPIO should NOT place 40%-100% bonus incentives on TOP of National Register historic districts? Why? Careful planning can be done to NOT scramble two valuable ideas together. CPIO started out as THE historic preservation tool for transferring responsibilities for preservation in the Redevelopment Area in central Hollywood. The density bonus incentives mistakenly were piled on IN THE PRECISE LOCATIONS THAT WERE TO BE PROTECTED. Planning is about resolving the conflict, not causing it. Move these incentives OFF the historic buildings. The explanation of why no affordable housing incentives are in the SNAP area near 3 Metro stops is untenable.
2. EXHIBIT I – an Ordinance—should not be adopted. It is a hidden repeal – not a “clarification” or “Amendment” as publicly stated. It removes critical steps to identify, plan for, design review, for historic buildings. Crazily, these are the same implementation tools proposed in the in the Plan text to be added in the future. They already exist. Do not repeal them,
3. EIR conclusion of “unavoidable” significant adverse impact on historic buildings is simply untrue. The argument that this is “just being honest” is untrue—the plan includes no analysis, no mapping of conflicts, no attempt to resolve the conflicts, and no mitigations. The Redevelopment Plan—with the same landmarks in central Hollywood--managed to develop mitigations. All of those City Planning now proposes to repeal.
4. Much of the proposed Plan and ordinances had no public hearings and no environmental review.



March 10, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90012
By Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update ("Plan") and the draft Community Plan Implementation Overlay ("CPIO") released on February 10, 2021, which is under consideration by your City Planning Commission on March 18, 2021.

As a former Commissioner on the Community Redevelopment Agency (CRA/LA), I well remember the important role CRA/LA played in the revitalization of Hollywood. And, I well recall the considerations by City policy leaders to elevate the role of Hollywood as a key Regional Center which would be a focal point for jobs, housing, tourism, entertainment, and an overall driver of regional economic activity and success. Having invested billions in the subway system – with three stations in Hollywood – it stands to reason that the Hollywood community was, and is, accepting of playing this critical role in the life of our region. As a business owner in Hollywood, I want Hollywood to remain an economic driver for the City and region. A thriving Hollywood generates significant tax revenue, jobs, and standing for the City of Los Angeles.

While positive steps are being made, there are ongoing concerns regarding plans to reduce Floor Area Ratio in the core of Hollywood. The reduction of the base FAR to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood's commercial corridors and should be further incentivized.

The reduction of the base FAR does not achieve the stated goals in the HCPU2 to create "residential and commercial density, transit-oriented districts, affordable housing, and employment opportunities near transit infrastructure that supports sustainable and walkable neighborhoods."¹ As discussed above, a base FAR of 3:1 alone would not provide enough incentives for developers to apply for the highest permissible density under the Plan.

With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging higher density transit-oriented developments, with underutilized parcels bring converted to housing, mixed-use developments, and job-generating uses near public transit. The HCPU2 describes the Regional Center as "a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services."² By allowing more people to live and work in an area with public transit, a base FAR of 4.5:1 is much better suited to achieve these City of LA objectives.

¹ Draft Plan (February 2021), pp. 3-21. Goal LU9.

² Draft Plan (February 2021), pp. 1-10.

A thriving Hollywood is of major importance to the region's economic recovery and the City's economic future. We hope that the Hollywood Community Plan can finally be adopted and that it reflects a more dynamic vision for the community and our City.

With Regards,

A handwritten signature in blue ink, appearing to read "Dwayne A. Gathers", with a long, sweeping underline that extends to the right.

Dwayne A. Gathers
President



Gonzales Law Group, APC

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Michael Gonzales

E-mail: mgonzales@gonzaleslawgroup.com

March 10, 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: HOLLYWOOD COMMUNITY PLAN UPDATE - CPC-2016-1450-
CPU; ENV-2016-1451-EIR**

Dear Commissioners:

This firm represents multiple property owners with various properties located throughout the Hollywood community. Please accept this letter as public comment on the draft Hollywood Community Plan Update (“Hollywood Community Plan”) and the draft Community Plan Implementation Overlay (“CPIO”) released on February 10, 2021. Both the Hollywood Community Plan and the CPIO will be considered by this Commission on March 18, 2021.

We are encouraged by the progress being made on the Hollywood Community Plan and look forward to additional opportunities to engage with the City. We understand that the CPIO reflects feedback received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood’s success. In particular, we were pleased to see the Site Plan Review threshold increased for affordable housing projects (which would eliminate unnecessary and duplicative California Environmental Quality Act (“CEQA”) review for projects that are consistent with the CPIO); permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding some of the changes and respectfully request that the City Planning Commission adopt the following revisions to the CPIO:

- The CPIO must increase base floor area ratio (“FAR”) in both the Regional Center 1B and Regional Center 2 designations.
- The CPIO must clarify that the change of use 1,000 average daily trip Site Plan Review threshold (the “ADT Threshold”)¹ does not apply to CPIO Affordable Housings Projects (defined below).

Increased FAR within the Regional Center will allow for a more effective and efficient use of land by CPIO compliant projects that include an affordable component (“CPIO Affordable Housing Projects”). Hollywood is a center of transit that should incentivize higher density mixed-use projects rooted in smart growth. Hollywood’s two Metro B Line stations at Hollywood and Highland and Hollywood and Vine, plus the numerous bus lines that service the community’s many transit corridors present a unique opportunity to create a community centered on transit. A base FAR of 3 to 1 and a bonus FAR of 4.5 to 1 in the Regional Center 1B designation is inconsistent with the draft CPIO circulated in August 2020. The previously circulated draft CPIO had a base FAR of 4.5 to 1, with a bonus of up to 50 percent. Similarly, a base FAR of 2 to 1 and a bonus FAR of 3 to 1 in the Regional Center 2 designation is not sufficient when many of the same properties can achieve a ministerial 3.75 FAR using the existing Transit Oriented Communities (“TOC”) program. Increasing the supply of affordable housing is essential to a well-balanced community, especially one centered around high quality transit. The CPIOs proposed base and bonus FAR, however, could result in less investment in Hollywood because FAR is too low to maximize the permissible density bonus. Moreover, in light of the prior draft CPIO, the current version’s FAR structure could be viewed as a downzoning, scaring away future investment. This Commission should increase base and bonus FAR in the Regional Center 1B designation consistent with the draft CPIO circulated in August 2020 and should increase base and bonus FAR in the Regional Center 2 designation to 3 to 1 and 3.75 to 1.

Raising the Site Plan Review threshold for CPIO Affordable Housing Projects will eliminate unnecessary and duplicative CEQA review. As this Commission knows, the CEQA process is abused by anti-development activists that use CEQA to delay project implementation. We applaud efforts to streamline project implementation. While the CPIO raises the residential density threshold trigger for Site Plan Review, the CPIO fails to address the ADT Threshold.

City agencies have interpreted the ADT Threshold to apply in cases of new construction where a new use is added to project site. When a mixed residential and commercial project is proposed on a site previously occupied only by commercial uses, the City has taken the position

¹ Los Angeles Municipal Code Section 16.05.C.1(d) provides that “any change of use other than to a Drive-Through Fast-food Establishment or to a Fast-food Establishment which results in a net increase of 1,000 or more average daily trips as determined by, and using the trip generation factors promulgated by the Department of Transportation.”

that a change of use is occurring, and the ADT Threshold applies. Accordingly, a CPIO Affordable Housing Project that is below the CPIO's Site Plan Review residential threshold but also includes a commercial component can nevertheless exceed the ADT Threshold triggering Site Plan Review. As drafted, the CPIO signals a disincentive for mixed-use projects within the Regional Center and within the many transit corridors. City Planning and smart urban growth, on the other hand, encourage mixed use projects in these locations because they are transit rich and will lead to a reduction in Vehicle Miles Traveled resulting in reduced green-house gas emissions. As an example, a CPIO Affordable Housing Project located in Hollywood's Regional Center that includes 175 residential dwelling units (below the residential threshold) and 12,000 square feet of general ground floor retail will exceed the ADT Threshold triggering Site Plan Review. Similarly, a CPIO Affordable Housing Projects located along one of the various CPIO transit corridors could also exceed the ADT Threshold if such a project includes a moderately sized ground floor commercial component.

The CPIO clearly intended a ministerial process for CPIO Affordable Housing Projects but by failing to address the ADT Threshold, the CPIO introduces ambiguity for projects that seek to include a commercial component. Instead of incentivizing mixed-use CPIO Affordable Housing Projects in transit rich Hollywood, the draft CPIO discourages such projects from including commercial components. Accordingly, CPIO Affordable Housing Projects will either forgo including commercial components to avoid the ADT Threshold, or will artificially reduce residential density while including a commercial component in a manner that avoids the ADT Threshold. In either case, an optimal use of land designated by the Hollywood Community Plan for high density and high intensity is not achieved. Development potential in proximity to transit could be sacrificed to avoid CEQA review. Moreover, the inherent ambiguity regarding the ADT Threshold may result in investment steering away from Hollywood and into areas where the Site Plan Review thresholds are clear. Accordingly, the CPIO should expressly exclude the ADT Threshold as a Site Plan Review trigger and clearly signal to the business community that mixed-use CPIO Affordable Housing Projects are encouraged.

Very truly yours,



Michael Gonzales
Gonzales Law Group APC



March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90012
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update (“Plan”) and the draft Community Plan Implementation Overlay (“CPIO”) released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021.

We are encouraged by the progress being made on the Plan and look forward to continued engagement with the City on the revisions and ultimate approval. We understand that the CPIO reflects feedback the City received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood’s success. We were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding certain changes and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO (“August CPIO”) throughout the Regional Center, as well as the following:

- Increase the base from 3:1 to 4.5:1 FAR with a maximum bonus FAR of 6.75:1 within the RC1B zone;
- Modify the affordability levels required in Level 2 Incentive in the Affordable Housing Incentive Bonus outlined in Section II-4.B of the CPIO to (1) be on a sliding scale based on AMI level, rather than a flat percentage; (2) permit additional FAR beyond the maximum bonus of 6.75:1 FAR; and (3) allow inclusion of workforce, moderate-income, or above-moderate income housing;
- Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives;
- Including an incentive to reduce open space as part of the Additional Incentives, as previously included in the August CPIO; and
- Assuming City Planning Commission rejects the above requests, requiring the preparation of an economic study justifying the reduction of the FAR in the Regional Center area.
- The CPIO must clarify that the change of use 1,000 average daily trip Site Plan Review threshold (the “ADT Threshold”) does not apply to CPIO Affordable Housings Projects (defined below).

A. Baseline FAR Proposed in the August Plan Should be Preserved

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood’s commercial corridors and should be further incentivized. A major criticism by community groups is the demands that many projects make to remove restrictions, change zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood. We believe the proposed updates in February 2021 were responsive to this vision of Hollywood.

The reduction of the base FAR 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 As discussed above, a base FAR of 3:1 alone would not provide enough incentives for developers to apply for the highest permissible density under the Plan.

By reverting to the higher base FAR of 4.5:1 proposed in the August CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City’s much-needed housing stock, but also provide job-generating uses near public transit that align with the City’s current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. The HCPU2 describes the Regional Center as “a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services.”² By allowing more people to live and work in an area with public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan’s objectives.

Finally, higher-intensity developments as allowed by the higher base FAR of 4.5:1 provide more opportunities for developers to contribute to solving the City’s general housing shortage. Today, it is common knowledge that many Angelenos do not meet the income limits and thus do not qualify for the affordable housing, yet are nevertheless burdened by California’s high housing costs. An increase of the base FAR to 4.5:1 and inclusion of incentives for workforce, moderate, and above moderate incomes would allow developers the opportunity to create a diverse range of housing options that would fit the needs of all Angelenos. A good balance of housing at various income levels is needed to provide additional workforce housing and moderate-income housing, which is vital to the revival of the local economy in Hollywood and the City at large post Covid-19.

B. The Bonus Incentives Should be Revised to Allow for More Flexibility

As stakeholders in Hollywood, we appreciate the City’s vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.

The inflexibility proposed as part of the CPIO will cause many housing development projects in Hollywood to not to be economically feasible with a base FAR of 3:1, so in practice less units will be constructed, including affordable housing units. Developers rely on market-rate units, commercial spaces, waivers (including reduction in open space) to offset the costs of building affordable units, thus the mix of affordable units and market-rate units must be carefully balanced in order to incentivize the maximum amount of residential density. A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

For the reasons mentioned above, we urge the City Planning Commission to incorporate our suggested amendments and revert to the 4.5:1 base FAR within the RC1B area to put Hollywood on a path of renewed growth and prosperity that would work for everyone in the community.

C. The CPIO must clarify that the change of use Site Plan Review threshold does not apply to CPIO Affordable Housing Projects

Raising the Site Plan Review threshold for CPIO compliant projects that include an affordable component (“CPIO Affordable Housing Project”) will eliminate unnecessary and duplicative California Environmental Quality Act (“CEQA”) review. As this Commission knows, the CEQA process is abused by anti-development activists that use CEQA to delay project implementation. We applaud efforts to streamline project implementation. While the CPIO raises the residential density threshold trigger for Site Plan Review, the CPIO fails to address the ADT Threshold.

City agencies have interpreted the ADT Threshold to apply in cases of new construction where a new use is added to project site. When a mixed residential and commercial project is proposed on a site previously occupied only by

¹ Draft Plan (February 2021), pp. 3-21. Goal LU9.

² Draft Plan (February 2021), pp. 1-10.

commercial uses, the City has taken the position that a change of use is occurring, and the ADT Threshold applies. Accordingly, a CPIO Affordable Housing Project that is below the CPIO's Site Plan Review residential threshold but that also includes a commercial component can nevertheless exceed the ADT Threshold triggering Site Plan Review. As drafted, the CPIO signals a disincentive for mixed-use projects within the Regional Center and within the many transit corridors. City Planning and smart urban growth, on the other hand, encourage mixed use projects in these locations because they are transit rich and will lead to a reduction in Vehicle Miles Traveled resulting in reduced green-house gas emissions. As an example, a CPIO Affordable Housing Project located in Hollywood's Regional Center that includes 175 residential dwelling units (below the residential threshold) and 12,000 square feet of general ground floor retail will exceed the ADT Threshold triggering Site Plan Review. Similarly, a CPIO Affordable Housing Projects located along one of the various CPIO transit corridors could also exceed the ADT Threshold if such a project includes a moderately sized ground floor commercial component.

The CPIO clearly intended a ministerial process for CPIO Affordable Housing Projects but by failing to address the ADT Threshold, the CPIO introduces ambiguity for such projects that seek to include a commercial component. Instead of incentivizing mixed-use CPIO Affordable Housing Projects in transit rich Hollywood, the draft CPIO discourages such projects from including commercial components. Accordingly, CPIO Affordable Housing Projects will either forgo including commercial components to avoid the ADT Threshold, or will artificially reduce residential density while including a commercial component in a manner that avoids the ADT Threshold. In either case, an optimal use of land designated by the Hollywood Community Plan for high density and high intensity is not achieved. Development potential in proximity to transit could be sacrificed to avoid CEQA review. Moreover, the inherent ambiguity regarding the ADT Threshold may result in investment steering away from Hollywood and into areas where the Site Plan Review thresholds are clear. Accordingly, the CPIO should expressly exclude the ADT Threshold as a Site Plan Review trigger and clearly signal to the business community that mixed-use CPIO Affordable Housing Projects are encouraged.

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



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For March 18, 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 March2021- 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 (HPCU), released February 5 for your February 18 and March 18, 2021 hearings.

Since last month's hearing, where density bonus incentives appeared to be the primary topic of discussion, we immersed ourselves in the data and calculations underlying this plan and the proposed incentives; ran case studies; calculated the advisability of re-establishing the upzoning on Hollywood Boulevard which at your last meeting was moved back to 1988 levels; and started the economic studies you requested. We concluded that priority #1 must be to plan to retain extant affordable housing (often historic housing) and affirmatively stop demolitions; #2 to seriously add adaptive re-use of the large vacant historic buildings to this Plan's tools; #3 to extend both the TDR and affordable housing NOW to SNAP areas now excluded; #4 as noted below to hold adequate missing public hearings on the many parts of this plan that were changed recently and were not a part of the circulated EIR.

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 touted as “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 historic homes intact, maybe with some units at the back? Why are major landmark churches showing as opportunity sites for high density new buildings?
- Why are there no maps where people can clearly see what is proposed on designated historic sites and historic districts, and whether the sites of landmarks are upzoned?
- Why does City Planning claim they can’t have “new” protections for historic buildings, due to SB 330, when the most robust historic protections are already in effect, and this HPCU proposes to remove them?
- Why are prevailing wage rates being eliminated by City Planning, which were voted on by citizens in Measure JJJ?

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. The Planning Department adoption of those Guidelines downtown was a milestone for LA. The Hollywood Community Plan is missing that kind of effort.

What is the backstory—how are Cultural Resources treated by the HPCU? The proposed Plan and its CPIO has changed radically with 4 revisions, the latest rolled out immediately before comments were due on the Plan.

- **HPOZs and CHMs will remain:** The HPCU states a major preservation feature is “Preserve the six HPOZs (Historic Preservation Overlay Zones)”. HCM’s will retain their current review by OHR and the delay of demolition for a year.
- **Upzoning invisible:** There no maps where people can clearly see what is proposed on designated historic sites and historic districts, and whether the sites of landmarks are upzoned. The actual part of this Community Plan that gets adopted is Zoning Ordinances for every land parcel. No proactive or inventive zoning to resolve conflicts was attempted.
- **Plan flyers promote HPCU as “about” preservation:** Flyers and summaries tell the public about historic preservation goals etc. In fact there is nothing but reductions in support for historic buildings. The flyers say there are height limits protecting the National Register Historic District on Hollywood Boulevard; in fact we see only a small section of the Boulevard has any proposed height limits, against a backdrop of massive limitless height and cancellation of urban design height controls.
- **First ever Preservation Element promised:** 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, historic resources, open space etc. are consistent with the proposed Land Use/zoning and vice versa.
- **Preservation Element falls legally and practically short:** But in our HPCU Plan text we see a promising start on a Preservation Element-- the history that made Hollywood famous. But it devolves into a “Chapter” of the Plan text, recounts current City Planning activities; stops before fully identifying where the landmarks are; blurs what unique features, challenges or opportunities they might pose; does not integrate resources into the proposed zoning; and

puts out Implementation Policies as aspirations-- while removing the very same policies in the proposed Exhibit I Ordinance. (See attached HPCU flyer and see #2 below.)

More background-- Late in the HPCU process, after issuance of the Plan and EIR, around 1,000 historic resources transferred to City jurisdiction:

- **Redevelopment had responsibility for National Register and California Register Districts and Section 511 list:** Unfortunately, this Plan was started so long ago that the lions share of preservation activity and protections in central Hollywood – the Redevelopment area—were administered then by the CRA (Community Redevelopment Agency). The Hollywood Redevelopment Plan for 34 years had robust protections for resources in the City, and had demolition delays, recurring historic surveys, and District protections paralleling CHMs, SurveyLA, and HPOZs.
- **CRA Transfer to City Planning November of 2019,** all those landmarks and their protections were transferred to the City , after the City had already issued the Hollywood Community Plan and its EIR. The landmarks were improperly identified; the City’s responsibilities undertaken for them un-discussed.
- **Definition and protection of historic resources reduces listings, has wiggle language in the proposed CPIO;** CPIO definitions eliminate many designated National and California Register sites from the current definition; remove the current delay of demolition that parallels the CHM protections; freeze districts in time—some designated 30 years ago—so that buildings won’t be investigated in case their authentic facades have been covered over, and some completely restored buildings won’t be recognized.
- **New construction in historic districts, including Hollywood Boulevard National Register District allows replacement:** It allows replacement of buildings within historic districts with NO design review
- **Exhibit I repeals specific protections promised by the City:** A proposed Ordinance presented for Commission approval repeals the Redevelopment protections that paralleled CHMs and HPOZs – repeal in direct conflict with Mitigations promised by City Planning in the Mitigated negative Declaration for the “transfer”.

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 could 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.

#1: Remove the CPIO upzoning incentives from Hollywood Boulevard and the Character Residential (aka Historic) Districts, and correct mapping errors and lists of historic resources

#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

#3: Save Hollywood Boulevard

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

#5: The greenest building is one that already exists. Hollywood has the highest concentration of historic resources in LA after Downtown in Los Angeles. Work with OHR and preservation organizations to accurately identify and map the important historic buildings, remove the unnecessary bullseye off of historic resources, and make the Plan Implementation section real.

#1: Remove the CPIO upzoning incentives from Hollywood Boulevard and the Character Residential (aka Historic) Districts, and correct mapping errors and lists of historic resources

The Plan and CPIO speak soothingly about preservation. The proposed CPIO puts a direct bullseye on our commercial main street and California Register historic neighborhoods-- our theatres, galleries, Jimmy Kimmel, the Academy Awards.

Case Studies: 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, piling upzoning on top of CHMs, National and California Register Districts.

Hold public hearings for this newly issued CPIO: The proposed CPIO creates an unneeded artificially-created conflict between historic neighborhoods and housing production incentives—all crowded into in the artificially limited land area which was supposed to be preserved.. It is unnecessary and should be removed.

This 97 page 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. 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. 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.

Make preservation protections in CPIO at least equal to current:

- Extend City- approved HPOZ and HCM-type mechanisms to State and Nationally -listed historic buildings and Districts to achieve an equal level of City treatment. *Or don't remove all the current mechanisms which have provided that equivalent protection for 34 years.* 3rd class treatment of Federal and State -identified resources is unacceptable, and terrible precedent for future Community Plans.
- Extend HPOZ treatment for altered or “non-contributors” within designated Districts: Make sure improperly altered buildings are investigated for reversibility and assessed rather than state in advance they can be demolished. Buildings on vacant lots must be compatible with districts. Follow Preservation Brief #14 and the Niles decision on the effects of new construction on historic districts

- Remove the upzoning incentives from the Hollywood Boulevard Commercial and Entertainment Historic District, including 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..)
- Instead have true re-investment tools: Validate parking in City lots built to cover the historic buildings parking deficit. Allow housing in upper floors of existing historic buildings.
- For CPIO, locate the upzoning incentives NOT on historic districts – move to 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 and the California Register neighborhoods finally escape the stranglehold of land speculation. Major large buildings and large numbers of homes and apartments have sat vacant for years. 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, Require

Calculate actual current 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.

#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—and even repeals all tenant protections!

As noted above, 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 were mandatory parts of the Hollywood Redevelopment Plan (HRP). This ordinance is touted as a “clarification”, and virtually no one reading it would know what it means.

Hold public hearings about repealing all of the historic protections carried over from Redevelopment, specifically promised by City Planning to NOT be repealed:

- 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 large filing fees which were assessed as a part of the CRA transfer to City planning
- Clarify the role of OHR

Reject the proposed Ordinance Exhibit I to REPEAL the same provisions proposed as policies and implementations in the HPCU Plan text. These are the centerpiece proposals for the future implementation of historic preservation for the HPCU Section 5 and 7. (“P” noted below are Plan Policies. These same provisions the Planning Commission is asked to repeal by forwarding Exhibit I to PLUM. Some examples:

P		Redev Plan Sec
P28:	<u>Planning, design review</u> : “Ensure that the character of historic neighborhoods are maintained .. by providing review of new development within historic neighborhoods” HRP states Any residential area with architecturally or historically significant structures may be further planned to reduce allowable density, require compatible design, ensure adequate parking, and conserve structures.”	HRP Sec 505
P35	<u>Design review</u> : “..use the Secretary of the Interior Standards”—HRP 409 All rehabilitation undertaken in the Project Area... determined by the Agency to be of architectural or historic significance shall be rehabilitated in accordance with the Secretary of the Interior Standards	HRP Sec 409
P38:	<u>Survey listing and protection</u> : “protect designated and eligible historical buildings in the Regional Center”— 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	HRP Sec 511
P38:	<u>Planning, design review</u> : Hollywood Boulevard and Sunset Boulevard Plans (<i>sic</i> - was ‘Hollywood Core Transition District Plan’)- HRP required Hollywood Boulevard Urban Design Plan in 5 years – overdue and stalled from adoption- - 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:	<u>Design review</u> : showing under “complementary design” for new infill in historic districts and “matches the scale”	HRP Sec 506
P40:	<u>Design review- standards</u> : 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	<u>Survey listing and public information</u> “Support and complete HistoricPlacesLA on-line” . All of the properties identified by the CRA are <u>not</u> integrated “Agency... shall maintain publicly available list of all buildings within the Project Area which it determines to be architecturally or historically significant” . Agencies listing of 1.078 known landmarks not integrated or shown in ZIMAS	HRP Sec 511
P70-76:	<u>Parking and traffic programs</u> to support businesses in existing buildings mandated for CRA—having been done well	HRP Sec 506 and 518
	<u>Design review</u> for any project exceeding 80/du/acre	HRP Sec 505.1
	<u>Design review</u> All development plans (public or private) within the Redevelopment Area shall be subject to review and approval (existing regulation PRIOR to SB 330):	HRP_Sec 407.1.4,
	Establish zoning regulations to ensure appropriate review of design for resources. Removing this section demotes the most significant landmarks:	
	<u>Design review</u> : Agency must review commercial uses in residential areas and residential uses in commercial areas	HRP 505.4 and 506.3
**	<u>Displacement</u> : To the maximum extent feasible. Seek to build replacement housing within the Project Area and prior to the destruction or removal of dwelling units which house low and moderate income people	410.2

** Ordinance recommends repeal although this was never transferred!

#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 ask you to roll back the clock drastically, to remove protections, to give the Director of Planning wide-ranging discretion with no public input, to treat significant portions 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 touristy new buildings and billboards. Successful specialty retail and entertainment locales must be attractive first to locals.

- Accurately show the District: The HPCU and CPIO mistakenly show the district from Las Palmas to Cahuenga, rather than its full extent from Sycamore to Argyle.
- Discretionary Review: Every building within the National Register District boundary line must be protected by discretionary review. Altered contributors must be investigated—as many buildings have their facades covered up but are still extant. Altered contributors can be restored, 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.
 - *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*
- Main Street Ingredients that make a successful District are 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.
 - *Identify and remove zoning code impediments to reuse of existing commercial building upper floors*
- No upzoning: Hollywood Boulevard has underlying zoning from the 1988 Plan that was close to the highest in the City 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. High density is already allowed there—CPIO incentives not needed, as residential construction is allowed in commercial districts by right.
 - *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.*
 - a. *CPIO upzoning affordable housing incentives are inappropriate along Hollywood Boulevard. Adaptive re-use is more appropriate.*
 - b. *Stop discretionary zoning actions allowing projects 2-5 times what zoning allows--that incentivize vacant and mothballed buildings*
 - c. *Stop mythologizing that new construction is a rising tide to lift all boats. It hasn't worked.*

#4 : Enact necessary Mitigation Measures for Cultural Resources, 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.

- “Unavoidable impacts” are avoidable: 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.
- Mitigations are known and possible: 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 rezoning, 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...
- “Automatic” CEQA clearances The CPIO makes untenable statements about that must be removed.

Don’t kill the goose that laid the golden egg. Positive preservation must be added to the HPCU, such as:

- 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 two earlier versions of the HPCU, one on which the EIR was based. Hollywood Heritage prepared GIS format maps to make this efficient, and others have mapped it also.
- Check necessity of any upzoning: 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 household projections using State Finance Dept data, and evaluate against RHNA numbers for a realistic view. (We heard SCAG had adjusted to RHNA numbers.)
- Adopt clear mitigation measures
- Adopt environmentally superior EIR Alternative 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.*

All projects are required to meet Environmental Review Standards Appendix A, being recommended for Approval of the Planning Commission, but the page is blank.

#5: The greenest building is one that already exists. Hollywood has the highest concentration of historic resources in LA after Downtown in Los Angeles. 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 99% 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.

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,



Brian Curran
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



THE
HOLLYWOOD
PARTNERSHIP

March 10, 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 detailed letters dated Nov 19, 2020 and February 16, 2021 in advance of the two public hearings held previously on the HCPU/CPIO and are pleased to see many of those recommendations reflected in the most recent 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. Already in Hollywood, even public facilities such as parks and the library have shifted away from providing publicly accessible facilities due to drug abuse, prostitution, and intentional, senseless damage occurring within them. Unfortunately, for any such facility to be provided responsibly, they must be coupled with dedicated, on-site management and supervision which adds significant cost to the well-intended idea. **We recommend relaxing these operational requirements to get the open space that the community sorely needs. Additionally, we recommend instituting an in-lieu fee option toward the density bonus for commercial buildings.**

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, **the CPIO should also reference a corresponding building area of 200,000 square feet and eliminate the 1,000 average daily trips as site plan review qualifiers. Additionally, the same consideration should be applied to non-residential buildings qualifying for density bonuses through the provision of publicly accessible open space.**

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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. **With regards to the ancillary impact of C2 zoning affecting open-air / rooftop dining above the second floor, we recommend modifying their prohibition to stating that the use would require a conditional use permit.**

For projects that meet affordability requirements and changes of ground floor use, removing the mandate of parking provision from the auspices of zoning makes a lot 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. On the topic of preservation, we also recognize the need to preserve Hollywood's historic buildings but are concerned any proposed approach to extend height limits onto proximal, non-historically protected buildings. Blanket height limits are not an appropriate tool for a dynamic, mixed-use Regional Center. Historic districts and buildings should be managed through their requisite historic preservation and landmarking processes which are more targeted and would not inhibit growth on sites that do not share a comparable historic or cultural significance.

Finally, we were shocked to see the base 4.5:1 to 3:1 FAR reduction in the recent draft. Housing is a product. Like all products, the process of building new housing includes many different costs – some of which are commodities such as building materials and fixtures, whereas others are scarce resources such as land, precision engineering or striking architectural design. Often in the most substantial cost for developing in Los Angeles is the inflated cost of land, which has no controls for pricing. Moreover, developable land is extremely limited inside the Regional Center, usually on sites less than half an acre in size which results in a need to go vertical to ensure that a project is financially viable. Indeed, there are not many areas for reducing the cost of housing production, and LA's notoriously litigious climate only adds years of carrying cost and settlements to the pricing of the final product. These challenges play out in the delivery of housing in Los Angeles, where the creation of this housing severely lags the national average (one unit permitted for every 1.8 jobs added) with a product delivery rate of only one unit permitted per 3.2 jobs added. As a result, Los Angeles experiences the second lowest vacancy rate for any metropolitan statistical area in the U.S., thus exacerbating the affordability crisis through a predictable upward pressure on pricing.

To produce affordable housing and effectively make the product cost less to consumers, developers generally have two options: (1) plug the gap in operating revenue via accessing a hyper-competitive financial tool such as low-income housing tax credits, Measure HHH funding and/or developing on land provided through a community land trust, or (2) reallocate the lost revenue across the market-rate units, effectively inflating the cost to consumers for the majority share of units in a mixed-income project. **Unfortunately for mixed-income projects in Hollywood – access to financial subsidy tools is non-existent, meaning that the only path forward for delivering affordable housing is through cost reallocation.** Only two of

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the 19 residential projects in the pipeline inside the HED BID have received financial subsidies to offset the cost of building affordable housing. Importantly - both of those projects are 100% affordable, meaning that they do not have market rate units to which cost can be reallocated.

Simply put, lower allowable density results in a glass ceiling on the number of units that can carry a project's reallocated cost burden. There will simply be fewer units to spread the cost, and in a competitive market, those units run the risk of being priced above market norms. As such, the project will either need to be marketed as "luxury" to justify the higher rents or worse, be deemed infeasible and not be built, thereby worsening the production shortages referenced above. To maximize the feasibility of the number of affordable housing units that can be provided, land should be provided with higher FARs so that the total number of market rate units that can be delivered is greater. **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.**

In relation to the plan development process, 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. In Hollywood, employment grew 20% between 2002 and 2010, outpacing job growth in Council District 13, the City, and the region. Between 2010 and 2017, Hollywood added 8,000 jobs for a growth rate of 36%—again, far exceeding the rate of growth for its larger geographic contexts. Considering the opportunity to attract major job creators to Hollywood, and given the unintended consequence and valuation associated with suppressed density, providing the opportunity to develop at higher FARs will better facilitate the land assemblages large enough to attract companies interested in a Hollywood location. For the benefit of the people of Los Angeles, the City's regulatory framework should support the direction of the market, not restrain it.

The HCPU/CPIO 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 a third round of public comment on the HCPU / CPIO. An updated community plan and zoning are critical for Hollywood, especially considering that the current plan is over three decades old. To that end, this plan should be approached as also having a very long shelf life ahead, and mindfully, ensuring that it is the right plan for the long-term growth of Hollywood and not overly reflexive to contemporary pressures. We welcome your continued partnership in advancing this important plan for the community.

Sincerely,

Kristopher Larson, AICP
President & CEO

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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

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JOE REHFELD
6250 HOLLYWOOD BLVD UNIT 70
LOS ANGELES CA 90028

March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update ("Plan") and the draft Community Plan Implementation Overlay ("CPIO") released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021. My name is Joe Rehfeld and I am a property owner regarding the properties at 6250 Hollywood Blvd. Unit 70, Los Angeles CA 90028 and 1255 N Cherokee Ave, Los Angeles CA 90038, and a business owner of Brentwater Partners LLC, also located at 1255 N Cherokee Avenue, Los Angeles, CA 90038.

We are encouraged by the progress being made on the Plan and look forward to continued engagement with the City on the revisions and ultimate approval. We understand that the CPIO reflects feedback the City received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood's success. In particular, we were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding certain changes and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO ("August CPIO") throughout the Regional Center, as well as the following:

- Increase the base from 3:1 to 4.5:1 FAR with a maximum bonus FAR of 6.75:1 within the RC1B zone;
- Modify the affordability levels required in Level 2 Incentive in the Affordable Housing Incentive Bonus outlined in Section II-4.B of the CPIO to (1) be on a sliding scale based on AMI level, rather than a flat percentage; (2) permit additional FAR beyond the maximum bonus of 6.75:1 FAR; and (3) allow inclusion of workforce, moderate-income, or above-moderate income housing;

- Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives;
- Including an incentive to reduce open space as part of the Additional Incentives, as previously included in the August CPIO; and
- Assuming City Planning Commission rejects the above requests, requiring the preparation of an economic study justifying the reduction of the FAR in the Regional Center area.

A. Baseline FAR Proposed in the August Plan Should be Preserved

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood’s commercial corridors and should be further incentivized. A major criticism by community groups is the demands that many projects make to remove restrictions, change zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood. We believe the proposed updates in February 2021 were responsive to this vision of Hollywood.

The reduction of the base FAR 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 As discussed above, a base FAR of 3:1 alone would not provide enough incentives for developers to apply for the highest permissible density under the Plan.

By reverting to the higher base FAR of 4.5:1 proposed in the August CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City’s much-needed housing stock, but also provide job-generating uses near public transit that align with the City’s current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. The HCPU2 describes the Regional Center as “a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services.”² By allowing more people to live and work in an area with

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public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan's objectives.

Finally, higher-intensity developments as allowed by the higher base FAR of 4.5:1 provide more opportunities for developers to contribute to solving the City's general housing shortage. Today, it is common knowledge that many Angelenos do not meet the income limits and thus do not qualify for the affordable housing, yet are nevertheless burdened by California's high housing costs. An increase of the base FAR to 4.5:1 and inclusion of incentives for workforce, moderate, and above moderate incomes would allow developers the opportunity to create a diverse range of housing options that would fit the needs of all Angelenos. A good balance of housing at various income levels is needed to provide additional workforce housing and moderate-income housing, which is vital to the revival of the local economy in Hollywood and the City at large post Covid-19.

B. The Bonus Incentives Should be Revised to Allow for More Flexibility

As stakeholders in Hollywood, we appreciate the City's vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.

The inflexibility proposed as part of the CPIO will cause many housing development projects in Hollywood to not be economically feasible with a base FAR of 3:1, so in practice less units will be constructed, including affordable housing units. Developers rely on market-rate units, commercial spaces, waivers (including reduction in open space) to offset the costs of building affordable units, thus the mix of affordable units and market-rate units must be carefully balanced in order to incentivize the maximum amount of residential density. A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

For the reasons mentioned above, we urge the City Planning Commission to incorporate our suggested amendments and revert to the 4.5:1 base FAR within the RC1B area to put Hollywood on a path of renewed growth and prosperity that would work for everyone in the community.

Los Angeles City Planning Commission
March 11, 2021
Page 4

Respectfully,

Joe Rehfeld

Joe Rehfeld, Property Owner (multiple properties), Business Owner

JUDY REHFELD
6250 HOLLYWOOD BLVD UNIT 70
LOS ANGELES CA 90028

March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
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Los Angeles, California 90036
Email: cpc@lacity.org

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Los Angeles City Planning Commission
March 11, 2021
Page 4

Respectfully,

Judy Rehfeld

Judy Rehfeld, Property Owner (multiple properties)



March 15th, 2021

Los Angeles City Planning Commission
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Los Angeles, CA 90012
cpc@lacity.org

Dear Commissioners,

On behalf of the Just Hollywood Coalition, comprising several faith, labor, environmental, and tenant organizations, we wish to provide our input on the latest iteration of the Hollywood Community Plan. The proposed draft CPIO does not do enough to address Hollywood's crisis of displacement, ensure that hotel use does not crowd out housing, or promote sustainable development. Additionally, increasing Base FAR to 4.5 would significantly worsen the plan by encouraging entirely market-rate or commercial developments in the Regional Center (RC1B).

Below, summarized by subject, are our suggested changes to the draft CPIO.

DON'T UNDERMINE AFFORDABLE HOUSING INCENTIVES, BUILD UPON IT

In order to encourage affordable housing, Base FAR should be kept the same and affordable housing incentives layered on top to encourage building of affordable housing, rather than granting developers the right to build larger buildings without appropriate affordable housing requirements. Accordingly, we propose the following:

1. Keep the Base FAR the same as it is under current law, incentivizing developers to use CPIO affordable housing bonuses to build affordable housing.
2. Allow increases to FAR in proportion to the amount of affordable housing offered. Suggested amounts are as follows. Note we are not opposed to increasing the maximum allowable FAR but rather are suggesting that the proposed bonus increases be tied to reasonable and substantial levels of affordable housing, rather than no or low requirements considering the value of the incentives:
 - a. Keep Base FAR where it is. Where Base FAR is 2, do not undermine use of Bonus Incentives or density bonus by increasing the Base FAR to 3. Under density bonus, projects can access increase of FAR to 3 by providing 11% Very Low or 20% Low Income Housing. We urge an additional option- 8% Extremely Low for an Increase to 3 FAR in the Regional Center. (Equivalent to TOC Tier 2)
 - b. Increase 4.5 FAR : 11% Extremely Low Income, 15% Very Low or 25% Low Income (Roughly Equivalent to existing TOC Tier 4 standards that allow increase to 4.5 FAR). This is slightly higher than proposed in the draft CPIO and reflects that most of these sites are in Tier 4.
 - c. Increase to 6.5 FAR: We support the formula in the draft CPIO which requires an additional 3% of extremely low, very low or low income units or 4.5% moderate for each 1 FAR obtained.
3. For non-residential (including hotel, office, etc) projects that require a zone change to increase the size of the building, require the minimum sustainability findings set out in the next section.

The currently proposed Hollywood Plan increases allowable base FAR. For example, the proposed Hollywood Community Plan increases the base allowable FAR by 50% from 2 to 3 FAR in as an non-exhaustive example

subareas 2:1B, 4:1G, 4:5C, parts of 4:5L, 4:5 allowing apartments, hotels, offices and other uses without requiring affordable housing or other community benefits. Giveaways like this disincentivize the creation of housing by making our affordable housing bonuses worth less- a developer can build another use like a hotel or offices without providing any community benefits. They also increase the chance that developers will be satisfied with the relatively high FAR offered and build solely market rate housing and not the affordable housing we need. This already happens in Hollywood, as was demonstrated by a recent project **an 185-unit apartment complex at 1375 St Andrews Place**, that provided no affordable housing because it did not take advantage of the density bonus law for any additional density of FAR increases but rather simply utilized the substantial FAR of 4.5 already allowed in that area.¹

Increasing Base FAR to 4.5 would be disastrous. That would amount to an 125% increase (an increase from 2 FAR) on some parcels including 4:5 C, 4:5L, 4:5D in Base FAR with no affordable housing. The August 2020 CPIO draft allowed an increase to as high as 6.75 FAR for affordable housing set asides no higher than 10% for Extremely Income people. In contrast, in other parts of the plan (roughly La Brea Ave between Hollywood and Fountain, called Corridor 1 in the CPIO map) the affordability requirement is 11% for a FAR increase to 3.75 FAR (around Sunset/La Brea). **Under this proposal, developers in some of the most desirable parts of Hollywood could build market-rate housing or a hotel without providing affordable housing or build nearly double what they are allowed to build elsewhere while providing less affordable housing.** Our proposal would correct these disincentives and require an appropriate level of affordability.

WE MUST ENCOURAGE HOMES NOT HOTELS

Los Angeles is undergoing a hotel boom, with more hotel rooms in the pipeline in Los Angeles, even during this pandemic, than any other place in the country.² Several projects, past and present in the Hollywood Community Plan area have proposed replacing housing with hotels (see for example: attempts to convert the Villa Carlotta to a hotel, 2000 Highland Ave Proposal, the Whitley Ave Project). While the proposed plan bans hotels in certain multi-family areas, it would do little to stop the conversion of hotels to housing elsewhere- indeed, by upzoning some existing apartment buildings (for example the rent stabilized building located at 1611 Schrader, which has its base FAR increased from 2:1 to 3:1), it could encourage the replacement of buildings like these with hotels or other commercial uses. More control over hotels are needed to ensure a proper balance between bonafide residential and hospitality uses.

Hotels are by-right in the regional center by historical accident. In 1982, City Council passed Ordinance 1565681, in order to allow higher residential density (R5 density, rather than R4 density) for mixed use projects in commercial zones (which are generally limited to R4 density) in the Regional Center.³ The intent was to

¹ The actual project was slightly over 3 FAR. If the base FAR had been at 2, the developer would have needed to utilize the density bonus to build this project. <<https://planning.lacity.org/pdiscaseinfo/document/MjIwMzQ10/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd>>

² <https://www.travelpulse.com/news/hotels-and-resorts/los-angeles-leads-among-us-markets-for-total-hotel-construction-pipelines.html>

³ “The adopted ordinance enabled and incentivized mixed use developments in areas in the city that the General Plan had identified for a higher and more intense level of development. Mixed use development fosters the concept of smart growth, which combines residential and commercial uses in relatively close proximity. City policies encourage development that can accommodate housing, jobs and retail near each other... The adopted ordinance provided the incentive of the higher residential density permitted in the R5 zone for commercially zoned developments in order to

encourage mixed use development in the Regional Center, not hotels. Decades later, in 2014, City Planning issued a strained interpretation⁴ stating that CUPs were not required for hotels in the Regional Center. Clearing hotels of the CUP requirement did not come up in deliberations for the ordinance and as late as 2009⁵ and 2016 hotel projects in the Regional Center requested Conditional Use Permits. Other uses we encourage currently require CUPs, even in the Regional Center, including CUPs that allow additional residential density in exchange for affordable housing.⁶ Requiring CUPs for hotel use would give community members their input back, and allow the appropriate balance of hospitality and housing in the Regional Center.

Instead of by-right hotels, we need an upgraded Conditional Use Permit, appealable to City Council that gives the public more say over hospitality development and clearly requires at very least, housing be replaced when it is demolished for the purposes of hotel conversion. Below is our suggestion to amend the CPIO to create a special conditional use process, based on San Francisco's conditional use permit for hotels⁷, with added findings related to small business and protecting existing housing as provided below:

CPIO Section I-5-L should be amended as follows:

L. Conditional Use Permits for Hotels. Hotel **and transient occupancy residential** structures ~~that require the removal of residential units in the Regional Center subareas (RC1A, RC1B, RC2, RC3)~~ are required to obtain a Conditional Use Permit complying with the procedures in LAMC Section 12.24U **including the following findings:**

a. The project considers the impact of employees of the hotel on the demand in the Plan Area for housing, public transit, child-care, and other social services.

b. The project takes all feasible measures to employ residents of the Hollywood Community Plan Area in order to minimize increased demand for transportation.

encourage mixed use. “ From a Report to City Planning Commission for an ordinance that made technical changes to the ordinance. <https://clkrep.lacity.org/onlinedocs/2010/10-1354_rpt_plan_7-28-10.pdf>

⁴ See <https://tinyurl.com/hotelcup>. The memo infers that because the code states that R5 uses should be allowed on “any lot” in commercial zones, it supersedes the “proximity standard” requiring a CUP for hotel uses within 500 feet of residential zones. The memo states that because hotels are an enumerated use (allowed by-right or by CUP) within the R5 zones they are allowed within “any lot” regardless of distance from residential zones. The memo totally elides the fact that R5 zones impose several restrictions on hotels in R5 zones, including that they must front a major highway, and that hotels in R5 zones are not allowed to have restaurants or bars except for guest use.

⁵ See 2009 Project on Wilshire, seeking CUP. ZA-2008-2354-CU-CUB-ZAD-1A; <http://planning.lacity.org/PdisCaseInfo/Home/GetDocument/NmI5YzZmYjUtM2Q0ZC00NGJLWE4YmItNTc5M2MxNWZINDc30>

See 2016 Project on Kingsley. ZA-2016-1413-VCU-CUB-DB-SPR. <http://planning.lacity.org/PdisCaseInfo/Home/GetDocument/YTliZDJhOTItZDAwOS00NTBjLThlZmItZjg3ODAyMjU2NDg20>

⁶ 12.24 U – 26, which is appealable to City Council.

⁷ San Francisco Planning Code, Section 303 (g)

c. The project includes a transportation demand management plan that incorporates all feasible measures to encourage hotel workers and visitors alike to use public transportation, bicycles and other non-auto means of transportation.

d. The proposal takes into account the effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures incorporated into the project to increase demand for local goods and services.

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

f. The project will not negatively impact the housing market and shall replace any removed rent stabilized housing units or affordable units on the site with affordable units.

Furthermore, *we strongly believe that hotels are not deserving of density bonuses or CPIO incentives, specifically those designed to encourage an increased housing stock.* The current Draft policy does not provide strong enough protections and any incentivization of hotel development with increased FAR must not be permitted. Therefore, we ask the following change be made to Section I-8.A.2 of the Draft:

2. Applicability

Projects that utilize the CPIO Incentive System are required to provide certain types of Community Benefits, and as set forth in each of the CPIO Subareas in Chapters II through IV, and as described below:

- **Affordable Housing.** Projects with five or more dwelling units may only utilize an Affordable Housing Community Benefit.
- **Publicly Accessible Outdoor Amenity Space.** Projects with no Residential Uses may only utilize a Publicly Accessible Outdoor Amenity Space Community Benefit.
- **Relief.** Requirements of Section I-8 shall not be eligible for a CPIO Adjustment pursuant to Section I-6 C.3 or a CPIO Exemption Section I-6 C.4.
- **Limitations.** Projects including hotel or transient occupancy residential structure uses shall not be eligible for CPIO Incentives.

As demonstrated by an ongoing case at 639 S. La Brea, where a developer is using the TOC program to increase allowable building size from 1.5 FAR to 4.25 FAR, the transit oriented communities program can be misused to construct a development that provides more hotel rooms than housing.⁸ The point of the TOC program was not to allow easy ways for applicants to insert larger commercial components like hotels in housing developments but to create more housing in Los Angeles with an affordable component. Our suggestions would fix these issues.

⁸ Compare the currently proposed Wilshire / La Brea Project (ZA-2019-1744) using TOC incentives (<https://cgistrategies.com/project/la-brea-project/>) to the previously proposed density bonus project (CPC-2017-143-DB-MCUP-SPR): <https://therealdeal.com/la/2017/01/13/cgi-strategies-plans-160-unit-mixed-use-off-miracle-mile/>

Finally, the draft CPIO is unclear about whether hotels are commercial or residential uses. The City of LA generally considers hotels to be “residential uses” thus allowing for projects that include a hotel and a restaurant or other commercial to be considered mixed use and exempt from density restrictions under Ordinance 1565681. We should encourage mixed-use bonafide residential/commercial developments, not hotels. This error should be fixed by clearly defining hotels as commercial uses.

ENDING DISPLACEMENT, REQUIRING LONGER TERM AFFORDABLE HOUSING

Driven out by increased rents, the Hollywood population dropped by 12,500 between 2000-2010.⁹ In the face of the development boom, the Latino population dropped by 17% between 2000-2010, believed to be the largest mass departure from an LA neighborhood in decades.¹⁰ The current plan would unintentionally remove protections tenants have by making many housing projects ministerial. The new right of return program provided by SB 330 that allows tenants to return to units in new developments when their housing is demolished only applies when the housing development requires some kind of discretionary action, even something as light as site plan review or design review. Through smart policy, we can both encourage affordable housing and stop displacement by doing the following:

1. In projects that replace existing rent stabilized buildings, replacement units should be required in addition to affordable units required under TOC. Current policy only requires the replacement of a percentage of rent stabilized units destroyed unless the tenants prove that all tenants were low income, information that is often hard to come by.¹¹ Changing the policy will disincentivize the conversion of rent stabilized buildings and ensure that a net amount of affordable housing is created when RSO buildings are replaced with larger buildings.
2. Ensure SB 330 right of return policies are maintained by requiring Site Plan Review for housing development (irrespective of the number of base units) if there have been residential uses on the site in the last five years. *Alternatively, apply the SB 330 right of return and the replacement process detailed above to all new development.*
3. Require all affordable units to remain affordable for 100 years, rather than the 55 currently required. Alternatively, as in Santa Monica, New York City, and many other cities, require perpetual affordability.¹²
4. Set an annual cap of demolitions and conversions of RSO units in the Community Plan area.
5. An area-wide ban on condo conversions and conversions of RSO units to small lot subdivisions if the vacancy rate is less than 5 percent or there is no accurate estimation of the vacancy rate for the past year, similar to several Bonin-Koretz motions.¹³

⁹ Community Plan Area Demographic Profile 2010-2014.

<https://planning.lacity.org/complan/CPA_DemographicProfile/2014_HOLLYWOOD.pdf>

¹⁰ <https://www.laweekly.com/news/hollywoods-urban-cleansing-2612554>

¹¹ <http://hcidladev.lacity.org/ab-2222>

¹² See Chapter 19.22 of the West Hollywood Municipal Code; The Mandatory Inclusionary Housing Program of New York City (<https://www1.nyc.gov/site/planning/plans/mih/mandatory-inclusionary-housing.page>) which requires perpetual affordability; Cambridge also requires perpetual affordability: <https://www.cambridgema.gov/cdd/housing/fordevelopersandpropmanagers/inclusionarydevelopers>

¹³ See CF-19-1246: https://clkrep.lacity.org/onlinedocs/2019/19-1246_mot_10-15-2019.pdf and CF-17-0480: https://clkrep.lacity.org/onlinedocs/2017/17-0480_mot_05-03-2017.pdf

6. Update hotel conditional use permit to ban conversions of apartments to hotels or demolition of apartments to build hotels (addressed in above)

SUSTAINABLE HOLLYWOOD

The current plan does very little to encourage more sustainable development. Santa Monica's successful Downtown Community Plan (see Appendix A for a summary) provides a model of how a City can encourage more sustainable practices. Commercial projects over a certain size are required to work out development agreements with the City that include minimum environmental standards while allowing the City to push for more, including LEED Gold, additional water efficiency and demonstrated transportation plans that reduce vehicle miles traveled.

We propose that projects seeking discretionary increases to FAR in the Hollywood Plan CPIO area (i.e not using the TOC or Community Plan affordable housing programs in order to increase allowable FAR but rather requesting increased FAR through the conditional use process laid out in the CPIO or a zone change) require the City Planning Commission to make the following findings, establishing higher environmental standards:

- 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. 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.
- 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.

The plan currently contains no standards on native and drought tolerant plants. Based on the Expo Line TNP¹⁴, we recommend that 100% of all landscaping required for streetscaping on public property be native and drought tolerant, and 80% of all landscaping requiring for private property and in publicly accessible open space.

PROMOTING HISTORIC PRESERVATION

We urge changes to the proposed Transfer of Development Rights Program to preserve public input and prevent conflicts of interest:

1. Transfer of Development Rights should only be allowed between entities that have an arms-length relationship with each other. The current proposal could allow the same property owner to transfer floor area between two properties. This is problematic, because an applicant is using the TDR process with the intent to increase the building size, may, having achieved that, be more apt to neglect the preservation plan at their historic property, despite all efforts of the often understaffed Office of Historic Resources. With two arms-length owners, this concern does not exist to the same extent, because the owner of the historic resource will have the incentive to maintain the property.
2. The Preservation Plan and Transfer of Development Rights should be subject to a public hearing and approval by the Planning Commission (of the TDR) and Cultural Heritage Commission (of the

¹⁴ https://planning.lacity.org/odocument/a23f4f9b-eb33-4c59-b35b-3c9078e8c2ed/ExpoTNP_PlanText.pdf

Preservation Plan) so that the preservation community and members of the public have input on the plan. The now defunct CRA/LA Redevelopment Plan allowed for transfer of unused density in order to aid in preserving historic structures, but only with a public hearing before the CRA/LA board and the approval of a development/disposition agreement.

SUMMARY

1. Build Upon Rather than Undermine the Transit Oriented Communities Program:

- a. Keep Base FAR where it is. Where Base FAR is 2, do not undermine use of Bonus Incentives or density bonus by increasing the Base FAR. Under density bonus, projects can access increase of FAR to 3 by providing 11% Very Low or 20% Low Income Housing. We urge an additional option- 8% Extremely Low for an Increase to 3 FAR in the Regional Center.
- b. Allow projects to bonus up to 4.5 FAR in the Regional Center with the following **affordability requirement:** 11% Extremely Low Income, 15% Very Low or 25% Low Income (Equivalent to existing TOC Tier 4 standards, slight increase from proposal in the draft CPIO)
- c. For RC1B, allow bonuses to 6.5 FAR: We support the formula in the draft CPIO which requires an additional 3% of extremely low, very low or low income units or 4.5% moderate for each 1 FAR obtained.
- d. Special focus should go to incentivizing extremely and deeply low-income housing in order to provide housing or low-wage workers and the region's transit dependent population, especially given the transit-rich nature of the plan area.

2. Require a Conditional Use Permit for Hotels, Appealable to Council with the following findings:

- a. The project considers the impact of employees of the hotel on the demand in the Plan Area for housing, public transit, child-care, and other social services.
- b. The project takes all feasible measures to employ residents of the Hollywood Community Plan Area in order to minimize increased demand for transportation.
- c. The project includes a transportation demand management plan that incorporates all feasible measures to encourage hotel workers and visitors alike to use public transportation, bicycles and other non-auto means of transportation.
- d. The proposal takes into account the effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures incorporated into the project to increase demand for local goods and services.
- e. There is sufficient market demand for hotels, motels, or transient occupancy residential structures of the type proposed.
- f. The project will not negatively impact the housing market and shall ban replace any removed rent stabilized housing units or affordable units on the site with affordable units.

3. Clearly Define that Hotels are Commercial, not Residential Uses

4. Fix the TOC / CPIO Affordable Housing Program

- a. Require all affordable units to remain affordable for 100 years or perpetual affordability.
- b. In projects that replace existing rent stabilized buildings, replacement units should be required in addition to inclusionary units, ensuring that tenants have a place to return to when the new building is constructed and that developers produce an actual increase of affordable housing.
- c. No project including a hotel or transient occupancy residential structure can utilize the CPIO bonuses to increase allowable FAR.

- d. In order to make sure SB 330 protections like right of first refusal still apply, make projects with residential units in the past five years require site plan review. Alternatively, apply the right of first refusal and replacement standards listed above to all projects in the CPIO.

5. Additional Anti-Displacement Measures

- e. Set an annual cap of demolitions and conversions of RSO units in the Community Plan area
- f. An area-wide ban on condo conversions and conversions of RSO units to small lot subdivisions if the vacancy rate is less than 5 percent or there is no accurate estimation of the vacancy rate for the past year

6. Sustainability Standards: For Projects Seeking Discretionary Increases to FAR (i.e not using the TOC or Community Plan affordable housing programs in order to increase allowable FAR but rather requesting a zone change) The City Planning Commission should make the following findings on such projects, establishing higher environmental standards:

- 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. 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.
- c. The plan contributes to LA'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

Require 80% of landscaping on private property required under the plan (in publicly accessible open space or streetscape requirements) be drought-tolerant and native. Require 70% be drought tolerant and native for landscaping done on private property.

7. Transfer of Development Rights

1. Transfer of Development Rights should only be allowed between entities that have an arms-length relationship with each other, rather than a company making an agreement with itself to transfer density between two sites it controls.
2. The Preservation Plan and Transfer of Development Rights should be subject to a public hearing and approval by the Planning Commission (of the TDR) and Cultural Heritage Commission (of the Preservation Plan) so that members of the public and particularly the preservation community have input on the plan. The now defunct CRA/LA Redevelopment Plan allowed for transfer of unused floor area to encourage redevelopment but that was subject to a public hearing by the CRA. The same should be done with the TDR program in Hollywood.

Regards, the Just Hollywood Coalition





Hollywood Community Plan Los Feliz

Karen Stetler <kystet@gmail.com>
To: cpc@lacity.org

Wed, Mar 10, 2021 at 6:37 PM

I would like to express my disagreement with council-person Nithya Raman's recent proposal letter to you re: the HCP to remove building height limits on Hillhurst Avenue in Los Feliz. Ms. Raman did not discuss this proposal with the area residents or the neighborhood groups: LFIA (the neighborhood association that represents renters and homeowners), the BID or the Los Feliz Neighborhood Council. Here are my specific objections and I hope you will vote *not* to support her proposal to remove the height limits.

1. Raman's letter to you states the limits will be increased for developers with a "commitment" to affordable housing, but there's no clarification about what that means, or who will enforce that commitment. Can the developers avoid that commitment by paying fees rather than actually putting in affordable units (ie, in lieu fees)? Is a handful of low income units enough to satisfy this requirement?
2. We know it doesn't work—all of the new huge buildings in Hollywood have not alleviated the homeless problem.
3. Making the land that valuable will mean that landowners who currently have our little local retail shops and businesses will be incentivized to sell to large developers.
4. We have one of the last walking neighborhoods in LA.
5. The infrastructure we currently have as far as street widths and parking areas won't be able to accommodate this much development at once.
6. The environmental impact of the increased traffic could seriously impact the park's wildlife.
7. Northern Hillhurst is not close enough to the Vermont/Sunset subway station for a TOC approach to make sense. We don't even have a DASH bush that covers most of the neighborhood.

I support helping our unhoused neighbors - including supporting the new bridge housing, Project Roomkey and the upcoming low income building that will open soon - all on Riverside Drive in Los Feliz. I believe we need programs other than large-scale development. We need AFFORDABLE housing, not giant market-rate apartment/commercial buildings with a handful of low income units. I also support increased rent control to prevent further gentrification in the area. But, I can't support an unrestricted proposal to lift height requirements. Sincerely, Karen Stetler, Los Feliz

Chair Samantha Millman
Honorable Commissioners
Los Angeles City Planning Commission
200 N. Spring St.
Los Angeles, CA 90012
cpc@lacity.org

RE: Hollywood Community Plan, CPC-2016-1450-CPU, Item #6

Dear Commission President Millman,

On behalf of the Little Tokyo Service Center, a community service organization and developer of affordable housing across the region, I am writing in support of the Just Hollywood Plan and against the proposed increase in Base FAR to 4.5 in RC1B. We must build upon the successful Transit-Oriented Communities program, not undermine it. An increase to Base FAR will undermine use of the incentives and increase the price of land as hospitality, office and other uses crowd out the housing desperately needed to address the severe housing crisis.

We are currently partnering with Los Angeles County Metro Transit Authority to build 160-200 affordable units and approximately 15,000-20,000 square feet of commercial and social service space at the Vermont/Santa Monica station. We need policies that will help address the housing crisis, and not perpetuate it. For affordable housing developers like ourselves, land acquisition is an even more difficult process as rents cannot be adjusted to compensate for increases in the price of land. Upzoning without appropriate value capture can significantly increase the price of land, in some cases without producing any new development.¹ As the success of the TOC program shows, upzoning tied to affordable housing can incentivize affordable housing production in market-rate developments and significantly increase production of 100% affordable housing. **Hollywood cannot afford undermining this program. TOC and the value capture ordinance have significantly increased** 100% affordable housing development in Hollywood. At least 47 entirely affordable housing projects have been proposed in Hollywood through planning entitlements since 2018, amounting to 855 units.² This amounts to 16.3% of the total housing projects in Hollywood during that time, representing a significant increase over 2015-2017, when only 646 units in 29 projects were proposed. **We cannot afford to undermine this progress.** Rather, we should build upon them through keeping Base FAR the same and including the bonuses proposed in the draft CPIO, which will better tie upzoning to the affordable housing desperately needed.

Additionally, the plan needs more tools to avert Hollywood's crisis of displacement. To prevent the community plan from inadvertently undermining SB 330 protections, we must

¹ <https://journals.sagepub.com/doi/10.1177/1078087418824672>

² <https://planning.lacity.org/resources/housing-reports>

ensure that projects that use affordability incentives to replace RSO units build replacement units in addition to rather than in fulfillment of affordability requirements, and we have to adopt limits on condo conversions and other methods by which tenants are evicted. This includes a hotel Conditional Use Permit, appealable to Council, which bans conversion of homes to hotels to stop hotel driven displacement and also make sure we build what is truly needed in Hollywood: affordable housing.

Please adopt the community-based, equitable, Just Hollywood Plan.

Regards,



Erich Nakano
Executive Director



Planning CPC <cpc@lacity.org>

Hillhurst

Miriam Birch <birchpro@earthlink.net>
To: cpc@lacity.org

Tue, Mar 9, 2021 at 11:09 AM

I have lived in the neighborhood for 75 years.

I am against the proposed changes for Hillhurst Ave in the new Hollywood development plan.

There was no neighborhood input.

Do NOT make these changes.

Thank you,

Miriam Birch Pennington

TO: City Planning Commission
FROM: Neighborhood Stakeholders Sunset Boulevard Corridor 5
CC: Hollywood City Planning Team, CD4, CD5, HHWNC
RE: NEW INFORMATION for the March 18, 2021 Meeting on the Hollywood Community Plan
DATE: March 12, 2021

Based on the 2/18/2021 meeting, is it the advice of the City Planning Commission to MODIFY the objectives of the Hollywood Community Plan and restart the process?

Per the Staff Recommendation Report, the Hollywood Community Plan is intended to achieve the following overarching objectives:

1. Provide a range of housing and employment opportunities.
2. Promote the vitality and expansion of Hollywood’s media, entertainment, and tourism industry.
3. Conserve lower-scale neighborhoods.
4. Safeguard hillside areas.
5. Create a network of safe, multi-modal linkages.
6. Promote sustainable development.
7. Preserve and enhance social, cultural, and historic identity.
8. Improve public space, parks, and open spaces.
9. Conserve neighborhoods, districts, historic cultural resources, and public rights-of-way.

The zoning on SUNSET BOULEVARD BETWEEN FAIRFAX AVENUE AND VISTA STREET MEETS PLAN OBJECTIVES #1, #2, #3, #5, #6, #7 and #9.

We ask you to approve and recommend adoption of Corridor 5 zoning with our support for an appropriately scaled height increase ONLY for 100% affordable housing.

We can meet the plan objectives AND create the desired affordable housing. Up-zoning all main transit corridors uniformly will harm Hollywood irrevocably.

The City Planning Commission recommended that the five zoning corridors in the CPIO of the Hollywood Community Plan be restructured, potentially down to two corridors. The neighborhood stakeholders ask you to retain Corridor 5 zoning except for allowing an appropriately scaled height increase ONLY for 100% affordable housing. Alternatively, if the five corridors are condensed, we ask that you consider a third, lower zoned corridor for this portion of Sunset for the reasons set forth here in line with the Plan Objectives. Please note that during CPC public comment, there were no requests made to up-zone this corridor all up-zone requests were directed at the Hollywood Regional Center.

PLAN OBJECTIVE 1

“PROVIDE A RANGE OF HOUSING AND EMPLOYMENT OPPORTUNITIES.”

Through years of discussion and support from the two prior CD4 offices and City Planning, the stretch of Sunset from Fairfax Avenue to Vista Street has been envisioned to become the **Sunset Spaulding Square Arts District** focused on retaining our small, local and creative business tenants that currently serve the socio-economically diverse surrounding neighborhood. The stakeholders of our neighborhood (Fairfax Avenue on the west, Hollywood Boulevard on the north, Vista Street on the east, and Fountain Avenue on the south) are a diverse mix of owners and renters of every ethnicity, orientation and income bracket. Our residents live in high and low apartment and condo buildings, bungalow courtyards, ADUs, duplexes and single-family homes. Included in our neighborhood is the **Gardner Street Women’s Bridge Housing Center**, which we proposed to CD4 as a location for homeless housing and demonstrates our community’s commitment to both housing and historic preservation. Another important neighbor is the **Gardner Street Elementary School**, which draws its students from our neighborhood and is a Title 1 school with more than half of the 400-plus students living below poverty level.

RENDERING OF THE SUNSET SPAULDING SQUARE ARTS DISTRICT

Corner of Sunset and Gardner looking West toward Sunset and Spaulding Squares



We are working to make this neighborhood livable for ALL, therefore it is critical to maintain and grow the socio-economic diversity of our local businesses on Sunset. We want to avoid further displacement of these small businesses for larger corporate chains. We currently have two five-story mixed-use developments under construction on the south side of Sunset Boulevard between Gardner Street and Curson Avenue (7500 Sunset). We lost the iconic and historically significant treasures Meltdown Comics NerdMelt Showroom and the Parisian Florist (in the same location since 1924) to the development. Our many small business tenants were forced to leave, such as the Russian grocery and bookstore that served our Russian community. Allowing heights of 67 feet and encouraging the

development of new, taller structures requires corporate retail tenants on the first floor to be financially viable. If you drive along Sunset Boulevard to the west, you will see vacant mixed-use retail space in abundance. Our local businesses cannot afford, nor do they want these characterless spaces. **Retaining our height limit (except for 100% affordable housing) encourages adaptive reuse of buildings and keeps affordable commercial space available for lease to serve the surrounding community in a walkable manner.**

As the Commission rightly raised, we cannot predict the long-term effects of the pandemic on housing needs and street-front retail. **It's critical to also consider and assist small businesses in this environment.**

iving developer incentives to create seven-story structures along all main transit corridors without consideration of the scale and socio-economic diversity of the adjacent neighborhoods will absolutely displace our local, community-serving businesses and cause the community to be less livable and walkable.

PLAN OBJECTIVES 2 AND 7

“PROMOTE THE VITALITY AND EXPANSION OF HOLLYWOOD’S MEDIA, ENTERTAINMENT, AND TOURISM INDUSTRY.”

“PRESERVE AND ENHANCE SOCIAL, CULTURAL, AND HISTORIC IDENTITY.”

Because of their unique historical character, Sunset and Spaulding Squares are regular filming locations. We host endless tour vans with people eager to see where iconic shows and movies were filmed both now and decades ago. Retaining this important palm tree lined stretch of Sunset with hillside views as a resource for filming in Hollywood and as a popular tourist destination, both huge sources of revenue for the City, should be a priority. **If you paint all main transit corridors in Hollywood with Corridor 2 zoning, you will eliminate the architectural diversity and character of our many special neighborhood destinations.** It will look like any generic stretch of any urbanized city in America, and no one visits Hollywood to see that.

The Sunset Spaulding Square Arts District focuses on what the commercial strip features today and has historically included: independently owned music stores, art studios, services, shops and restaurants along with the guilds and production companies. **The district vision serves our broad range of socio-economic groups, appeals to the creative community, maintains a cohesive connecting point between the adjacent historic resources and apartments, preserves the character of the funky, artistic, local shopping strip and creates another notable and unique destination for Hollywood.**

PLAN OBJECTIVE 3

“CONSERVE LOWER-SCALE NEIGHBORHOODS.”

All main transit corridors do not need to be up-zoned uniformly to create the desired affordable housing. Per the Plan, height allowances should increase as you move toward the Regional Center. In the past, density bonuses have led to windfalls for property owners without commensurate benefit to the community. There is a current line of thinking that **the private market alone is not capable of delivering affordable housing because the underlying issue is the global increase in land value in urban areas, which drives up the price per square foot.** Using means that go beyond up-zoning and incentivizing developers are going to be necessary, such as putting a vacancy tax in effect immediately, preserving historic housing and exploring non-private housing options.

Hollywood is one of the most creative and internationally renowned places in the world. A ride along Sunset Boulevard is on every tourist’s list, and we should share the full array of its diverse character and creative enclaves both OLD and NEW. We can’t serve up one long, monotonous La Brea-like corridor with one size fits all zoning. **This 100-plus year-old lower scale, historic neighborhood is an important part of Hollywood’s beginning and its subsequent history, and the proposed height, FAR and density zoning on Sunset Boulevard between Fairfax Avenue and Vista Street should be retained.**

PLAN OBJECTIVE 5

“CREATE A NETWORK OF SAFE, MULTI-MODAL LINKAGES.”

The Sunset Spaulding Square Arts District is slated for pedestrian-oriented design guidelines and a streetscape plan in the Hollywood Community Plan. See plan language below.

P24	Create pedestrian-oriented design guidelines including a possible Streetscape Plan for commercial uses that foster pedestrian-oriented scale and character for the following street segments: <ul style="list-style-type: none">•Sunset Boulevard between Fairfax Avenue and Vista Street•Melrose Avenue between Highland Avenue and Orlando Avenues, inclusive of Melrose Place•Santa Monica Boulevard between Seward Avenue and Hoover Street•Hillhurst Avenue between Franklin and Los Feliz Avenues
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See verbiage from the Staff Recommendation Report below:

With respect to Neighborhood Districts, the Framework Element states the following:

Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles’ neighborhoods.

Objective 3.8: Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.

In accordance with the Framework Element, the clustering of neighborhood-serving uses minimizes automobile trips while encouraging pedestrian-oriented districts in proximity to adjacent residential neighborhoods. **Neighborhood Districts are located at several key areas throughout the Community Plan Area. The Framework identifies Neighborhood Districts at several intersections along Melrose Avenue and Hillhurst Avenue. The Proposed Plan extends an existing portion of Melrose Avenue in the Neighborhood District east to Highland Avenue and designates a portion of Sunset Boulevard generally between Fairfax Avenue and Vista Street as Neighborhood District;** see Exhibit C for more information. The Proposed Plan includes policies that call for encouraging appropriate housing opportunities, limiting incompatible uses, and ensuring that there are a variety of uses that serve the daily needs of adjacent residential areas. The CPIO District implements the policies of the Proposed Plan by establishing pedestrian-oriented design standards that contribute to neighborhood district identity and maintain their function as providing important neighborhood-serving uses. The CPIO District also tailors regulations to meet neighborhood-specific needs. In conformance with the Framework Element, the development standards for the CPIO’s Neighborhood-Serving Subareas strive to enhance the pedestrian and aesthetic appeal of neighborhood district areas.

PLAN OBJECTIVE 6

“PROMOTES SUSTAINABLE DEVELOPMENT.”

Key findings from a Los Angeles Conservancy study show that **“preservation positively affects housing, affordability, sustainability, density and economics.”** Specifically, **“Of the 35 HPOs that currently exist, 21 have populations where there is a greater share of racial diversity than in the rest of the city.”** And, **“As much as 69% of housing in HPOs has more than one unit, with 39% providing five or more units or apartments. This makes historic neighborhoods more accessible to renters and provides a greater range of rents and significantly higher density uses.”** Historic housing is affordable housing, so preservation should be used as one of our affordable housing tactics. **Zoning should promote adaptive reuse in the appropriate areas.** A 2011 study by the National Trust for Historic Preservation found that, even if a new building is 30% more energy efficient than a historic building, **it takes between 10 and 80 years (depending on the building type) to make up for the carbon emissions expended by demolition and new construction.**

PLAN OBJECTIVE 9

**“CONSERVE NEIGHBORHOODS, DISTRICTS, HISTORIC/CULTURAL RESOURCES,
AND PUBLIC RIGHTS-OF-WAY.”**

The Plan is the product of five years of tedious study of Hollywood by the City Planning team, and we thank them for their dedicated efforts. Most notably, we spent years working with City Planners **Craig Weber, Priya Mehendale, and Linda Lou** who took the time to understand the nuances and effect of development on every parcel street. **Increased zoning on Sunset between Fairfax and Vista without taking into consideration the feasibility, infrastructure and impact is counter to the integrity of the years-long process.** This zone has shallow commercial frontage directly abutting RD zoning thereby requiring transitional heights and making higher zoning impractical. As just one example, a 67-foot building on the NE corner of Gardner and Sunset will negatively impact the Gardner Street Elementary School by blocking all sunlight from the playground and the gardening program, create unsafe traffic conditions, and destroy a significant historical resource (Gardner Junction of the Pacific Electric Railway). Every parcel street has a story. We need more than two zoning options it is not a one size fits all solution.

OUR CURRENT ZONING IS IN COMPLETE ALIGNMENT WITH THE PLAN’S OBJECTIVES.

We ask you to retain the proposed height, FAR and density zoning on Sunset Boulevard between Fairfax Avenue and Vista Street with our support for allowing an appropriately scaled height increase ONLY for 100% affordable housing.

Thank you for your careful consideration of this important decision for the legacy of Hollywood.

Respectfully submitted by,

Cheryl Holland, President, Sunset Square Neighborhood Organization: hollandc@me.com

Lesley O’Toole-Roque, Board Member, Spaulding Square Neighborhood Association:
lesleyotooleroque@gmail.com

Laura Grenfell, Board Member, Sunset Square Neighborhood Organization: lbgrenfell@gmail.com

March 11, 2021

Yorkwood LLC
11755 Wilshire Blvd. #2140
Los Angeles CA 90025

BY EMAIL ONLY

Los Angeles City Planning Commission

200 North Spring Street, Room 272

Los Angeles, California 90036

Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update (“Plan”) and the draft Community Plan Implementation Overlay (“CPIO”) released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021. My name is Michael Nazzal, and I am an agent of Yorkwood LLC, regarding the property at 6800-6822 Hollywood Blvd. Los Angeles CA 90028.

We are encouraged by the progress being made on the Plan and look forward to continued engagement with the City on the revisions and ultimate approval. We understand that the CPIO reflects feedback the City received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood’s success. In particular, we were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding certain changes and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO (“August CPIO”) throughout the Regional Center, as well as the following:

☐ Increase the base from 3:1 to 4.5:1 FAR with a maximum bonus FAR of 6.75:1 within the RC1B zone;

☐ Modify the affordability levels required in Level 2 Incentive in the Affordable Housing Incentive Bonus outlined in Section II-4.B of the CPIO to (1) be on a sliding scale based on AMI level, rather than a flat percentage; (2) permit additional FAR beyond the maximum bonus of 6.75:1 FAR; and (3) allow inclusion of workforce, moderate-income, or above-moderate income housing;

Los Angeles City Planning Commission

March 11, 2021

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☐ Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives;

☐ Including an incentive to reduce open space as part of the Additional Incentives, as previously included in the August CPIO; and

☐ Assuming City Planning Commission rejects the above requests, requiring the preparation of an economic study justifying the reduction of the FAR in the Regional Center area.

A. Baseline FAR Proposed in the August Plan Should be Preserved

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood’s commercial corridors and should be further incentivized. A major criticism by community groups is the demands that many projects make to remove restrictions, change

zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood. We believe the proposed updates in February 2021 were responsive to this vision of Hollywood.

The reduction of the base FAR 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 As discussed above, a base FAR of 3:1 alone would not provide enough incentives for developers to apply for the highest permissible density under the Plan.

By reverting to the higher base FAR of 4.5:1 proposed in the August CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City’s much-needed housing stock, but also provide job-generating uses near public transit that align with the City’s current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. The HCPU2 describes the Regional Center as “a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services.”² By allowing more people to live and work in an area with public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan’s objectives.

1 Draft Plan (February 2021), pp. 3-21. Goal LU9.

2 Draft Plan (February 2021), pp. 1-10.

Los Angeles City Planning Commission

March 11, 2021

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Finally, higher-intensity developments as allowed by the higher base FAR of 4.5:1 provide more opportunities for developers to contribute to solving the City's general housing shortage. Today, it is common knowledge that many Angelenos do not meet the income limits and thus do not qualify for the affordable housing, yet are nevertheless burdened by California's high housing costs. An increase of the base FAR to 4.5:1 and inclusion of incentives for workforce, moderate, and above moderate incomes would allow developers the opportunity to create a diverse range of housing options that would fit the needs of all Angelenos. A good balance of housing at various income levels is needed to provide additional workforce housing and moderate-income housing, which is vital to the revival of the local economy in Hollywood and the City at large post Covid-19.

B. The Bonus Incentives Should be Revised to Allow for More Flexibility

As stakeholders in Hollywood, we appreciate the City's vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.

The inflexibility proposed as part of the CPIO will cause many housing development projects in Hollywood to not to be economically feasible with a base FAR of 3:1, so in practice less units will be constructed, including affordable housing units. Developers rely on market-rate units, commercial spaces, waivers (including reduction in open space) to offset the costs of building affordable units, thus the mix of affordable units and market-rate units must be carefully balanced in order to incentivize the maximum amount of residential density. A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

For the reasons mentioned above, we urge the City Planning Commission to incorporate our suggested amendments and revert to the 4.5:1 base FAR within the RC1B area to put Hollywood on a path of renewed growth and prosperity that would work for everyone in the community.

Respectfully,

Michael Nazzal

Agent

Yorkwood LLC

Yorkwoodllc@gmail.com



Planning CPC <cpc@lacity.org>

HEIGHT LIMITS

Mark Stevens <mzstevens1@icloud.com>
To: cpc@lacity.org

Thu, Mar 11, 2021 at 10:26 AM

Dear Sirs

I live in Los Feliz and have for more than fifty years.

I am extremely opposed to removing the height limitations anywhere right now—especially on Hillhurst Ave.

I do not believe you are representing our neighborhood as you said you would.

I'd be more than happy to speak with anyone in your office regarding this matter.

Please give a call 323.804.5826

Thanks and please **DO NOT INSTITUTE THIS CHANGE !!!**

Sincerely,

Mark Z Stevens



Hollywood Community Plan, Case No. CPC-2016-1450-CPU

Lois Becker/Mark Stratton <loismark@gmail.com>
To: Los Angeles City Planning Commission <cpc@lacity.org>

Tue, Mar 16, 2021 at 8:00 AM

Re: Hollywood Community Plan, Case No. CPC-2016-1450-CPU
March 18, 2021 CPC Agenda Item 6

Dear Planning Commission:

It has always been one of the defining wonders of Los Angeles that a vast reserve of open space bisects the city, such that escape into nature can be found just minutes from the hustle and bustle of everyday metropolitan life.

Hollywood is one of a number of Los Angeles communities that is blessed to stand with one foot firmly planted on the urban flatlands and another scaling the rugged wildlands of the Santa Monica Mountains. And what mountains they are — over 1,000 plant species, 500 mammal, bird, reptile, and amphibian species, an abundance of recreational opportunities, all interspersed with spectacular city views and quiet residential neighborhoods. In 1978 the United States Congress took these mountains under the umbrella of the National Park Service, creating the Santa Monica Mountains National Recreation Area (SMMNRA). The roughly 154,000-acre area was proclaimed “a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource...[providing] essential relief from the urban environment.” Its preservation and protection were deemed to be in the public interest for the sake of present and future generations alike.

The proximity and connectedness of mountains and flatlands, two distinct geographic areas coexisting within a single city and even within individual neighborhoods within that city, are key to the city’s beauty, character and strength. But these two geographies also present a challenge for city planners, because the truth is, for better and for worse, **the hillsides face very different problems and have very different needs from the flats.**

Hillside and canyon communities generally have been both the beneficiaries and the victims of their own “success.” Well-intentioned but frankly inadequate attempts to protect their open spaces and rustic charms have in some ways made them even more attractive to the general public and to developers, and there is always going to be conflict between the perceived economic “imperative” to develop and the environmental need to preserve . Like all of the mountains, the Hollywood Hills suffer from substandard, overburdened infrastructure, including narrow “country roads” that do not allow for easy emergency access, or timely evacuation. With the added stress of cut-through commuter traffic,

continuing development (often on lots formerly thought to be unbuildable), and an endless parade of tourists aggressively in quest of Hollywood sign photo ops to post on their social media, these communities passed their proverbial tipping points long ago. But this is not a reason to abandon efforts to find a new and better balance and mitigations for the damage already done. Time-honored strategies such as restrictive zoning, the designation and maintenance of scenic parkways, and so on may need to be updated – and, even more importantly, to be tightened up and properly enforced. These are all issues that should be (but are not) addressed in the Hollywood Community Plan Update.

But more than anything else, there is one issue of overriding concern all across the hillsides today: SAFETY FROM WILDFIRE. The entire Santa Monica Mountains range is an officially designated Very High Fire Hazard Severity (VHFHS) Zone, and the wildfire threat, exacerbated by climate change, is very real. The Hollywood Community Plan Update pays lip service to the risks posed by wildfire but then inexplicably concludes that their impacts are “less than significant.” This conclusion flies in the face of guidance from our own governor and the consensus of fire science experts, who consistently advise policies including home hardening, creation of defensible space, evacuation mapping, and *no new development in VHFHS Zones*.

The Hollywood Community Plan Update as currently proposed focuses myopically on the flats while failing to acknowledge either the unique value of the hillsides or the unique dangers that they face. This vision of the future will only add fuel to the already endangered Santa Monica Mountains ecosystem. And the health and survival of that ecosystem is essential to the health and survival of Los Angeles as a whole.

I ask you to think about the impact your planning decisions will have not only on the future of the Hollywood Flats but of a holistic community where two geographies meet and together make for a better, brighter future. Stakeholders and neighboring communities throughout the Santa Monica Mountains urge you to bear in mind and take appropriate actions to protect the hillsides of Hollywood. And especially, with wildfire danger on the increase and no end in sight, due to worsening climate conditions, it is absolutely essential that updates to the plans for hillside communities take fire risk into account every step of the way. And zoning changes or variances or exceptions – any city approval that might allow for increased density – might be acceptable and even desirable in the flatlands, especially in areas near transit hubs – but these kind of changes are not acceptable in VHFHS Zones.

For the health and wholeness of our city, I ask I therefore ask that you adopt wildfire safety policies that address this fire risk as part of the Hollywood Community Plan update to protect the hillsides and residents from future impacts of devastating wildfires.

Sincerely,

Mark Stratton



March 12, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90012
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update ("Plan") and the draft Community Plan Implementation Overlay ("CPIO") released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021.

As the 44 years of the world renowned music and the entertainment education and the higher education business owner in Hollywood, we are concerned with the limits to Maximum allowable FAR being placed on Regional Centers, and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO ("August CPIO") throughout the Regional Center designating restrictions on commercial development.

By removing the restrictions on Maximum allowable FAR proposed in the HCPU, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing, commercial and mixed-use developments would not only add to the City's much-needed housing stock, but also provide job-generating uses near public transit, such as creative & professional offices, retail, entertainment and cultural facilities, that align with the City's current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Sakimoto', written over a white background.

Takeshi Sakimoto
Vice President, and Corporate Secretary
Musicians Institute, Inc.

ADDRESS 6752 Hollywood Boulevard, Hollywood, CA 90028

EMAIL admissions@mi.edu | **TEL** 323.462.1384 | **TOLL FREE** 800.255.7529 | **FAX** 323.462.6978 | **WEB** www.mi.edu



Hollywood CPA

Noah Margo <noahthebuilder@roadrunner.com>

Thu, Mar 11, 2021 at 3:39 PM

To: cpc@lacity.org

Cc: priya.mehendale@lacity.org, linda.lou@lacity.org

Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update ("Plan") and the draft Community Plan Implementation Overlay ("CPIO") released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021. My name is Laura Margo, and I am a Property Owner regarding the property at [6100 Sunset Blvd.](#)

We are encouraged by the progress being made on the Plan and look forward to continued engagement with the City on the revisions and ultimate approval. We understand that the CPIO reflects feedback the City received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood's success. In particular, we were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding certain changes and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO ("August CPIO") throughout the Regional Center, as well as the following:

- Increase the base from 3:1 to 4.5:1 FAR with a maximum bonus FAR of 6.75:1 within the RC1B zone;
- Modify the affordability levels required in Level 2 Incentive in the Affordable Housing Incentive Bonus outlined in Section II-4.B of the CPIO to (1) be on a sliding scale based on AMI level, rather than a flat percentage; (2) permit additional FAR beyond the maximum bonus of 6.75:1 FAR; and (3) allow inclusion of workforce, moderate-income, or above-moderate income housing;
- Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives;
- Including an incentive to reduce open space as part of the Additional Incentives, as previously included in the August CPIO; and
- Assuming City Planning Commission rejects the above requests, requiring the preparation of an economic study justifying the reduction of the FAR in the Regional Center area.

A. Baseline FAR Proposed in the August Plan Should be Preserved

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood's commercial corridors and should be further incentivized. A major criticism by community groups is the demands that many projects make to remove restrictions, change zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood. We believe the proposed updates in February 2021 were responsive to this vision of Hollywood.

The reduction of the base FAR 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." As discussed above, a base FAR of 3:1 alone would not provide enough incentives for developers to apply for the highest permissible density under the Plan.

By reverting to the higher base FAR of 4.5:1 proposed in the August CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City's much-needed housing stock, but also provide job-generating uses near public transit that align with the City's current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. The HCUP2 describes the Regional Center as "a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services." By allowing more people to live and work in an area with public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan's objectives.

Finally, higher-intensity developments as allowed by the higher base FAR of 4.5:1 provide more opportunities for developers to contribute to solving the City's general housing shortage. Today, it is common knowledge that many Angelenos do not meet the income limits and thus do not qualify for the affordable housing, yet are nevertheless burdened by California's high housing costs. An increase of the base FAR to 4.5:1 and inclusion of incentives for workforce, moderate, and above moderate incomes would allow developers the opportunity to create a diverse range of housing options that would fit the needs of all Angelenos. A good balance of housing at various income levels is needed to provide additional workforce housing and moderate-income housing, which is vital to the revival of the local economy in Hollywood and the City at large post Covid-19.

B. The Bonus Incentives Should be Revised to Allow for More Flexibility

As stakeholders in Hollywood, we appreciate the City's vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.

The inflexibility proposed as part of the CPIO will cause many housing development projects in Hollywood to not to be economically feasible with a base FAR of 3:1, so in practice less units will be constructed, including affordable housing units. Developers rely on market-rate units, commercial spaces, waivers (including reduction in open space) to offset the costs of building affordable units, thus the mix of affordable units and market-rate units must be carefully balanced in order to incentivize the maximum amount of residential density. A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

For the reasons mentioned above, we urge the City Planning Commission to incorporate our suggested amendments and revert to the 4.5:1 base FAR within the RC1B area to put Hollywood on a path of renewed growth and prosperity that would work for everyone in the community.

Respectfully,

Laura Margo, Home of the Stars, L.P.



Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Noah Margo <noahpmargo@gmail.com>
To: cpc@lacity.org

Wed, Mar 10, 2021 at 9:40 PM

Dear Honorable Commissioners,

My name is Noah Margo. For over half a century our commercial center in Hollywood has been in my wife's family. It is home to several well known businesses that have faithfully served the Hollywood community. But in the last two years the riots, the global pandemic, the economy and now the IRS have forced us to look at re-examining our ability to hold on to the property.

We scrape by to make the mortgage while our tenants utilize the temporary relief allotted to them. Now, following the death of my mother-in-law, coupled with her impending Estate Tax, we may have no choice but to sell. We were hopeful about the potential of a 4.5 : 1 base FAR, but we now face a significantly reduced base FAR of 3:1. which will negatively impact our ability to practically sell a property that has been in our family for decades.

On the west side of our center sits a known drug-producing homeless encampment. Both local authorities and elected officials have ignored our pleas to help us rectify this situation. A chronic situation that is driving business from the center and driving more businesses out of Los Angeles. Besides the obvious issues, the encampment's occupants also continue to steal from our stores themselves.

Last June, during the riots, our center was prominently featured on the national news as we watched in horror as more than half of our hard working tenants were looted and vandalized.

We are on the edge of the CPIO regional area. We are on Sunset. We are surrounded by humongous commercial properties and more properties that are currently under construction, all with the increased FAR. We are not opposed to affordable housing, in fact we have used past opportunities to build AND operate affordable units in Los Angeles. But like every citizen, we do want the option to make the most of our investment if forced to sell. Please take into account the current construction occurring not more than a stone's throw away. Also, please consider the many hardships that have befallen so many honest hardworking families who comprise our center that will most certainly be put out of business if this should occur. Please reinstate the base FAR of 4.5 : 1.

Thank you,

Noah Margo
(310) 985-0337

March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update ("Plan") and the draft Community Plan Implementation Overlay ("CPIO") released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021. My name is Marty Shelton, and I am a representative regarding the property at 6110-6134 West Sunset Boulevard.

We are encouraged by the progress being made on the Plan and look forward to continued engagement with the City on the revisions and ultimate approval. We understand that the CPIO reflects feedback the City received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood's success. In particular, we were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding certain changes and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO ("August CPIO") throughout the Regional Center, as well as the following:

- Increase the base from 3:1 to 4.5:1 FAR with a maximum bonus FAR of 6.75:1 within the RC1B zone;
- Modify the affordability levels required in Level 2 Incentive in the Affordable Housing Incentive Bonus outlined in Section II-4.B of the CPIO to (1) be on a sliding scale based on AMI level, rather than a flat percentage; (2) permit additional FAR beyond the

maximum bonus of 6.75:1 FAR; and (3) allow inclusion of workforce, moderate-income, or above-moderate income housing;

- Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives;
- Including an incentive to reduce open space as part of the Additional Incentives, as previously included in the August CPIO; and
- Assuming City Planning Commission rejects the above requests, requiring the preparation of an economic study justifying the reduction of the FAR in the Regional Center area.

A. Baseline FAR Proposed in the August Plan Should be Preserved

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood’s commercial corridors and should be further incentivized. A major criticism by community groups is the demands that many projects make to remove restrictions, change zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood. We believe the proposed updates in February 2021 were responsive to this vision of Hollywood.

The reduction of the base FAR 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 As discussed above, a base FAR of 3:1 alone would not provide enough incentives for developers to apply for the highest permissible density under the Plan.

By reverting to the higher base FAR of 4.5:1 proposed in the August CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City’s much-needed housing stock, but also provide job-generating uses near public transit that align with the City’s current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. The HCPU2 describes the Regional Center as “a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services.”² By allowing more people to live and work in an area with

¹ Draft Plan (February 2021), pp. 3-21. Goal LU9.

² Draft Plan (February 2021), pp. 1-10.

public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan's objectives.

Finally, higher-intensity developments as allowed by the higher base FAR of 4.5:1 provide more opportunities for developers to contribute to solving the City's general housing shortage. Today, it is common knowledge that many Angelenos do not meet the income limits and thus do not qualify for the affordable housing, yet are nevertheless burdened by California's high housing costs. An increase of the base FAR to 4.5:1 and inclusion of incentives for workforce, moderate, and above moderate incomes would allow developers the opportunity to create a diverse range of housing options that would fit the needs of all Angelenos. A good balance of housing at various income levels is needed to provide additional workforce housing and moderate-income housing, which is vital to the revival of the local economy in Hollywood and the City at large post Covid-19.

B. The Bonus Incentives Should be Revised to Allow for More Flexibility

As stakeholders in Hollywood, we appreciate the City's vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.


The inflexibility proposed as part of the CPIO will cause many housing development projects in Hollywood to not be economically feasible with a base FAR of 3:1, so in practice less units will be constructed, including affordable housing units. Developers rely on market-rate units, commercial spaces, waivers (including reduction in open space) to offset the costs of building affordable units, thus the mix of affordable units and market-rate units must be carefully balanced in order to incentivize the maximum amount of residential density. A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

Los Angeles City Planning Commission
March 11, 2021
Page 4 of 4

For the reasons mentioned above, we urge the City Planning Commission to incorporate our suggested amendments and revert to the 4.5:1 base FAR within the RC1B area to put Hollywood on a path of renewed growth and prosperity that would work for everyone in the community.

Respectfully,

NAI Capital Commercial, Inc.

A handwritten signature in black ink that reads "MARTY SHELTON". The letters are cursive and somewhat slanted.

Marty Shelton
Vice President
(310) 440-8500

mls1230.docx

March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following letter as public comment on the draft Hollywood Community Plan Update (“Plan”) and the draft Community Plan Implementation Overlay (“CPIO”) released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021. My name is Marty Shelton, and I am a representative regarding the property at 6363 Hollywood Boulevard.

We are concerned about the Plan and its unintended consequences as it relates to a number of issues, including FAR reductions, use limitations, and lack of focus on the economic integrity of the community. We understand that the CPIO reflects feedback received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood’s success. In particular, we were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; however, we are concerned that there are insufficient FAR bonus incentives for non-residential projects with publicly accessible outdoor amenity spaces; yet, we are pleased to see the recommendation to modify the zoning in the Regional Center from C4 to C2.

Despite certain positive amendments to the CPIO, we have concerns regarding some of the changes and respectfully request that the City Planning Commission adopt the following revisions to the CPIO:

- Remove the requirement that new hotels in Regional Center Subareas RC1A, RC1B, RC2 and RC3 that involve the removal of existing residential units obtain a conditional use permit pursuant to LAMC 12.24 W.

The proposed requirement in the Plan for all new hotels that remove residential units in the Regional Center to obtain a conditional use permit adds additional hurdles to continued development in Hollywood and could limit the availability of services to the vital tourism industry that serves both Hollywood and the City of Los Angeles. This action could thereby further chill an already tenuous market for hotel development given the current economic realities being faced by the hospitality industry both during and post COVID-19 shutdowns.

First and foremost, there is already a city-wide entitlement process in place for the development of hotels. While the process varies depending on the particular site and zoning requirements, most hotels of a certain size are already subject to a discretionary process that will give the public an opportunity to provide feedback and voice any concerns for the potential development. This alone makes the requirement for a conditional use permit superfluous. Incorporating additional required entitlements and review processes for projects that would already be subject to entitlement processes will unduly burden developers to a point that will more than likely discourage the introduction of new hotels in the Plan area.

Over the years, Hollywood has earned its status as the entertainment capital of the world. In order to maintain this prestigious classification, it is imperative that the community continues to invest in the area and the local economy. The rebirth of Hollywood as the center of the entertainment industry is in its nascent stage and should be protected against overregulation, which may impede its progress. This would include anything that would unduly restrict non-residential projects or those facilities that service the industry, such as hotels.

As noted above, hotels in Los Angeles serve as business amenities and are not exclusive to the tourism industry. Impeding the construction of additional hotels in the form of this requirement for a conditional use permit directly undercuts the goals and policies underlying the Plan—to promote economic growth and jobs-housing balance.

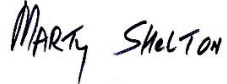
Finally, as we reach the one-year anniversary of the start of numerous Government-mandated restrictions and stay-at-home orders, now is not the appropriate time to be implementing new limitations directly affecting the hotel and hospitality industries, which have been hit among the hardest since the onset of the COVID-19 pandemic. In this regard, many hotel projects are currently being redesigned to convert to either office or residential uses, which would once again leave Hollywood severely underserved for temporary occupancy. When the effects of the pandemic subside and the level of tourism known to Hollywood returns, the need for new hotel projects will once again be present. These additional restrictions implemented by the Plan could potentially prevent Hollywood from realizing its full potential.

Los Angeles City Planning Commission
March 11, 2021
Page 3 of 3

For the reasons mentioned above, we urge the City Planning Commission to incorporate our suggested amendment and remove the requirement that new hotels in Regional Center that involve the removal of existing residential units obtain a conditional use permit, in order to bring renewed growth and prosperity back to Hollywood.

Respectfully,

NAI Capital Commercial, Inc.



Marty Shelton
Vice President
(310) 440-8500

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March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90012
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

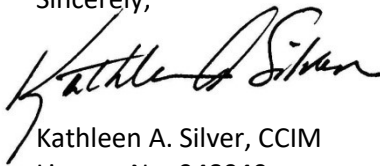
Dear Honorable Commissioners:

Please accept the following as public comment on the draft Hollywood Community Plan Update ("Plan") and the draft Community Plan Implementation Overlay ("CPIO") released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021.

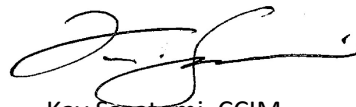
As a 45 year cumulative veterans in the commercial real estate industry, we are concerned with the limits to Maximum allowable FAR being placed on Regional Centers, and respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO ("August CPIO") throughout the Regional Center designating restrictions on commercial development.

By removing the restrictions on Maximum allowable FAR proposed in the HCPU, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing, commercial and mixed-use developments would not only add to the City's much-needed housing stock, but also provide job-generating uses near public transit, such as creative & professional offices, retail, entertainment and cultural facilities, that align with the City's current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors.

Sincerely,



Kathleen A. Silver, CCIM
License No. 948040
ksilver@naicapital.com



Kay Sasatomi, CCIM
License No.1824653
ksasatomi@naicapital.com

March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

Please accept the following letter as public comment on the draft Hollywood Community Plan Update (“Hollywood Community Plan”) and the draft Community Plan Implementation Overlay (“CPIO”) released on February 10, 2021, which will be considered by the City Planning Commission on March 18, 2021. My name is Marty Shelton, and I am a representative regarding the property at 6500 Hollywood Boulevard.

We are encouraged by the progress being made on the Hollywood Community Plan and look forward to additional opportunities to engage with the City. We understand that the CPIO reflects feedback received at the Hearing Officer Hearing on December 9, 2020. As long-time stakeholders in Hollywood, we were heartened to see that the City Planning Department also recommended many of the changes requested by the business community. We want Hollywood to remain an economic driver for the City and incorporating our feedback while balancing the needs of the community is critical to Hollywood’s success. In particular, we were pleased to see the Site Plan Review threshold increased to 200 units for affordable housing projects; permitting bonus incentives for non-residential offering publicly accessible outdoor amenity spaces; and modifying the zoning in the Regional Center from C4 to C2.

Despite these positive amendments to the CPIO, we have concerns regarding some of the changes and respectfully request that the City Planning Commission adopt the following revisions to the CPIO:

- The CPIO must clarify that the change of use 1,000 average daily trip Site Plan Review threshold (the “ADT Threshold”)¹ does not apply to CPIO Affordable Housings Projects (defined below).

Raising the Site Plan Review threshold for CPIO compliant projects that include an affordable component (“CPIO Affordable Housing Project”) will eliminate unnecessary and duplicative California Environmental Quality Act (“CEQA”) review. As this Commission knows, the CEQA process is abused by anti-development activists that use CEQA to delay project implementation. We applaud efforts to streamline project implementation. While the CPIO raises the residential density threshold trigger for Site Plan Review, the CPIO fails to address the ADT Threshold.


City agencies have interpreted the ADT Threshold to apply in cases of new construction where a new use is added to project site. When a mixed residential and commercial project is proposed on a site previously occupied only by commercial uses, the City has taken the position that a change of use is occurring, and the ADT Threshold applies. Accordingly, a CPIO Affordable Housing Project that is below the CPIO’s Site Plan Review residential threshold but that also includes a commercial component can nevertheless exceed the ADT Threshold triggering Site Plan Review. As drafted, the CPIO signals a disincentive for mixed-use projects within the Regional Center and within the many transit corridors. City Planning and smart urban growth, on the other hand, encourage mixed use projects in these locations because they are transit rich and will lead to a reduction in Vehicle Miles Traveled resulting in reduced greenhouse gas emissions. As an example, a CPIO Affordable Housing Project located in Hollywood’s Regional Center that includes 175 residential dwelling units (below the residential threshold) and 12,000 square feet of general ground floor retail will exceed the ADT Threshold triggering Site Plan Review. Similarly, a CPIO Affordable Housing Projects located along one of the various CPIO transit corridors could also exceed the ADT Threshold if such a project includes a moderately sized ground floor commercial component.

¹ Los Angeles Municipal Code Section 16.05.C.1(d) provides that “any change of use other than to a Drive-Through Fast-food Establishment or to a Fast-food Establishment which results in a net increase of 1,000 or more average daily trips as determined by and using the trip generation factors promulgated by the Department of Transportation.”

The CPIO clearly intended a ministerial process for CPIO Affordable Housing Projects but by failing to address the ADT Threshold, the CPIO introduces ambiguity for such projects that seek to include a commercial component. Instead of incentivizing mixed-use CPIO Affordable Housing Projects in transit rich Hollywood, the draft CPIO discourages such projects from including commercial components. Accordingly, CPIO Affordable Housing Projects will either forgo including commercial components to avoid the ADT Threshold, or will artificially reduce residential density while including a commercial component in a manner that avoids the ADT Threshold. In either case, an optimal use of land designated by the Hollywood Community Plan for high density and high intensity is not achieved. Development potential in proximity to transit could be sacrificed to avoid CEQA review. Moreover, the inherent ambiguity regarding the ADT Threshold may result in investment steering away from Hollywood and into areas where the Site Plan Review thresholds are clear. Accordingly, the CPIO should expressly exclude the ADT Threshold as a Site Plan Review trigger and clearly signal to the business community that mixed-use CPIO Affordable Housing Projects are encouraged.

Respectfully,

NAI Capital Commercial, Inc.

A handwritten signature in black ink that reads "Marty Shelton". The signature is written in a cursive, slightly slanted style.

Marty Shelton
Vice President
(310) 440-8500

mls1229.docx



Planning CPC <cpc@lacity.org>

Hollywood Community Plan / Homes Not Hotels (Item #6)

Olga Lexell <olga.lexell@gmail.com>

Mon, Mar 15, 2021 at 12:22 AM

To: Paul Koretz <paul.koretz@lacity.org>, daniel.skolnick@lacity.org, jeffrey.ebenstein@lacity.org, cpc@lacity.org

Dear City Planning Commissioners and Councilmember Koretz,

I am writing to encourage you to support the Just Hollywood Plan in particular around making sure we get more, not less community input on hotels, including making them appealable to Council rather than just Area Planning Commission. As you know, there have been several attempts in CD 5 (not in Hollywood) and in Hollywood (outside of 5) of homes being turned into hotels. Not only do we need a CUP appealable to Council with language that gives you better authority to stop these conversions but we also need more power to consider whether hotels are the best use altogether.

Thank you for leading on this issue.

Best,
Olga Lexell
90035 - CD5 Resident



Planning CPC <cpc@lacity.org>

Fwd: Apartment construction on Hillhurst

Pat <pat.bessone@gmail.com>
To: cpc@lacity.org

Mon, Mar 15, 2021 at 1:49 PM

Sent from my iPad

Begin forwarded message:

From: Patricia Bessone <pat.bessone@gmail.com>
Date: March 14, 2021 at 11:52:02 AM PDT
To: Nithya Raman <nitha.ramen@lacity.org>, Sarah Tanberg <sarah.tanberg@lacity.org>, Hollywood Plan <hollywoodplan@lacity.org>
Subject: Apartment construction on Hillhurst





Photographs of 4 apartment construction sites on Hollywood Blvd between Hillhurst and Edgemont

How many of these are for low income people and families?
Seniors, not poor, but with fixed incomes?

How many apartments do we need in this neighborhood ? Since Mar 2020 residents have moved out - loss of jobs, high rent, so there are many empty apartments

Please Do Not remove height limits!

I moved to this neighborhood from Greenwich Village, NY, a neighborhood that has continuously maintained great real estate value and quality of life due to height limitations.

This neighborhood needs fewer cars, not more. With tall buildings, garbage trucks block traffic, add to noise pollution. Please protect this community.

Thank you for your consideration in this matter

Patricia Bessone
1832 Edgemont St
Pat.bessone@gmail.com
Sent from my iPhone



Letter from USC, UCLA, and Occidental College faculty regarding the Hollywood Community Plan (CPC-2016-1450-CPU, Item #6).

Peter Dreier <dreier@oxy.edu>

Mon, Mar 15, 2021 at 2:48 PM

To: cpc@lacity.org

President Samantha Millman

Los Angeles City Planning Commission

[200 N. Spring St.](#)

[Los Angeles, CA 90012](#)

cpc@lacity.org

Dear President Millman:

On behalf of 16 academic researchers and practitioners at USC, UCLA, and Occidental College who focus on planning, housing, and economic development, I am pleased to provide you and your fellow City Planning Commission members with the attached letter regarding the Hollywood Community Plan, which you will be discussing at your meeting this week. (Hollywood Community Plan, CPC-2016-1450-CPU, Item #6). We would appreciate your distributing the letter to your fellow CPC members.

Hollywood's most important need is affordable housing for the workforce, including those essential workers who have kept society functioning during the pandemic. Los Angeles has an important opportunity to build upon the successful TOC program and build, with no public subsidy, additional affordable housing units.

The best way to do that is to build upon a successful bonus program, rather than increase the Base FAR and jeopardize utilization of affordable housing incentives and crowd out housing development. Our letter goes into some detail to explain why we have reached this conclusion. Please note that the co-signers of the letter include USC Professors Marlon G. Boarnet and Jorge De la Roca, co-authors of the new [study](#) of the city's TOC program published in the journal *Cityscape*.

The supply of affordable housing is the most important means of securing an equitable future for Hollywood and must be the most important objective of a just Hollywood Community Plan update. Please support a Just, Equitable Hollywood.

The following individuals have signed the attached letter:

Gary Blasi
Professor of Law Emeritus
School of Law
UCLA

Marlon G. Boarnet
Professor and Chair
Department of Urban Planning and Spatial Analysis
Sol Price School of Public Policy
University of Southern California

Jan Breidenbach
Adjunct Professor
Urban & Environmental Policy Department
Occidental College
Former Executive Director, Southern California Association of Non-Profit Housing

Jorge De la Roca
Assistant Professor
Sol Price School of Public Policy
Director of Research, Lusk Center for Real Estate
University of Southern California

Peter Dreier

E.P. Clapp Distinguished Professor of Politics

Founding Chair

Urban & Environmental Policy Department

Occidental College

Regina Freer

Professor and Chair

Politics Department

Occidental College

Former member and Vice President, Los Angeles City Planning Commission

Michael C. Lens

Associate Professor of Urban Planning and Public Policy

Associate Faculty Director, Lewis Center for Regional Policy Studies

Luskin School of Public Affairs

UCLA

Joan Ling

Lecturer

Urban Planning Department

UCLA

Former member, Community Redevelopment Agency of the City of Los Angeles

Former Executive Director, Community Corporation of Santa Monica.

Anastasia Loukaitou-Sideris

Distinguished Professor, Urban Planning

Associate Dean, Luskin School of Public Affairs

UCLA

Martha Matsuoka

Associate Professor

Urban & Environmental Policy Department

Occidental College

Paul Ong

Research Professor

Director, Center for Neighborhood Knowledge

UCLA Luskin School of Public Affairs

Seva Rodnyansky

Assistant Professor

Urban & Environmental Policy Department

Occidental College

Ananya Roy

Professor of Urban Planning, Social Welfare, and Geography

The Meyer and Renee Luskin Chair in Inequality and Democracy

Director, UCLA Luskin Institute on Inequality and Democracy

UCLA

Bhavna Shamasunder

Associate Professor and Chair

Urban & Environmental Policy Department

Occidental College

Abel Valenzuela

Professor of Urban Planning, Chicano and Central American Studies and Labor Studies

Director, Institute for Research on Labor and Employment

UCLA

Jonathan Zasloff

Professor

School of Law

UCLA

Peter Dreier

Dr. E.P. Clapp Distinguished Professor of Politics

Founding Chair (1996-2019), Urban & Environmental Policy Department

Occidental College

[1600 Campus Road](#)

[Los Angeles, CA 90041](#)

Phone: (323) 259-2913

FAX: (323) 259-2734



Letter to CPC Regarding Hollywood Community Plan - March 15, 2021.docx

31K

March 15, 2021

President Samantha Millman
Honorable Commissioners
Los Angeles City Planning Commission
200 N. Spring St.
Los Angeles, CA 90012
cpc@lacity.org

RE: Hollywood Community Plan, CPC-2016-1450-CPU, Item #6

Dear Commission President Millman and Planning Commission members:

According to a recent McKinsey Study, Hollywood has the largest affordability gap in the entire City of Los Angeles, with only 14% of Hollywood tenants able to afford a market rate apartment.¹ This distinction between what its renters can afford and the price for market rate in housing in the area is greater in Hollywood than in other higher rent areas of the City, creating a desperate need for more housing supply, especially affordable housing to serve Hollywood's essential workers. **The supply of affordable housing is the most important means of securing an equitable future for Hollywood and must be the most important objective of a just Hollywood Community Plan update.**

Protect Los Angeles' landmark Transit-Oriented Communities (TOC) program

According to a comprehensive study done by researchers at USC and the Urban Institute, the Transit-Oriented Communities Program is working to make a meaningful impact on the housing crisis, especially in strong markets like Hollywood.² The TOC program has provided the right type of balance to incentivize private construction of affordable units without giving developers a windfall (i.e., larger FARs) that they did nothing to earn. Accordingly, we are writing to urge the Planning Commission to protect Los Angeles' landmark Transit-Oriented Communities (TOC) program and reject increases to the Base FAR untethered to affordable housing, particularly the increase to 4.5 FAR in subarea RC1B considered at the last Commission meeting. The study found that TOC is well-calibrated, particularly in Hollywood, to ensure developers choose to build projects with affordable units rather than 100% market rate projects. Increasing the Base FAR, particularly to the 4.5 FAR often sought by housing projects in Hollywood, will upset the apple cart, incentivizing 100% market rate projects or crowding out housing all together as demand for commercial uses like hospitality and office push up the price of land and decrease the feasibility of housing projects. The question before you is not whether these incentives will work to create

¹<https://www.mckinsey.com/~media/mckinsey/industries/public%20and%20social%20sector/our%20insights/affordable%20housing%20in%20los%20angeles%20delivering%20more%20and%20doing%20it%20faster/mgi-affordable-housing-in-los-angeles-full-report-vf.pdf>, page 23

² <https://www.huduser.gov/portal/periodicals/cityscpe/vol23num1/ch5.pdf>

housing, but whether you wish to encourage the housing so desperately needed for Hollywood's essential workers (as well as take up of other incentive programs in the CPIO like historic preservation and open space) or grant an inequitable windfall to market rate and luxury commercial developers.

Instead of undermining affordable housing incentives, we encourage you to build upon them by adopting the proposals made by the Just Hollywood Coalition: namely retain the base FAR at 2 or 3 (rather than uniformly setting FAR at 3 as proposed in the draft CPIO) where it is presently and allow increases in RC1B to as much as 6.5 for greater levels of affordability (as proposed in the draft CPIO). Doing so will more than undo the harmful legacy of Prop U era downzoning in Los Angeles while creating equitable outcomes in the form of more affordable housing. As laid out below, these incentives are working, undermining them will deter housing production in important parts of Hollywood, and building upon rather than undermining the incentives is the best option.

Under current law, projects can use Transit Oriented Communities incentives or off menu Density Bonus incentives to increase FAR from as low to 2 FAR to 4.5 FAR. During the last hearing, a Commissioner questioned whether the incentives would produce affordable housing, or we would end up with 100% market rate housing at 3 FAR.

As shown by the projects below, under current incentives (via the density bonus or TOC) developers generally opt to participate in the bonus programs and increase floor area by 50-225% rather than build 100% market rate housing at a lower FAR. CPIO Incentives for 4.5 FAR are generally greater than allowed in current law, because of streamlining provisions, no parking requirement and the removal of redevelopment era density limitations. The projects listed provided similar or even greater amounts of affordable housing than required by the proposed CPIO which requires 10% ELI, 14% Very Low Income or 23% Low Income in order to qualify. Given relatively high density limits (200 feet/unit) in the Regional Center, the most significant incentive for many projects is a requested increase in FAR.

1. 5509 W. Sunset Blvd: Density Bonus increase from 3:1 to 4.5 FAR. ~15% VLI housing.³
2. Artisan Hollywood/1520- 1542 N. Cahuenga Blvd⁴: Regional Center, Located in RC1B area. Increase from 3:1 FAR to 4.5 FAR, 10% ELI. 290 units / 23 stories. No specific density increase requested. *Under the August 2020 draft, the FAR would increase to 4.5 FAR with no affordability requirement.*
3. 6007 Sunset: 10% VLI and 1% LI using density bonus. FAR increase from 1.5 to 3 FAR.⁵

³ <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjMxMzYw0>

⁴ <https://planning.lacity.org/pdiscaseinfo/document/NjkwNjg0/4596a256-522b-4c94-acc5-77ce1b3c8ef1/esubmit>

⁵ <https://planning.lacity.org/pdiscaseinfo/document/MjM5NA0/532f8e86-06a9-44b1-8001-06cd07316c90/esubmit>

4. Hawthorn & McCadden Place/ Regional Center: 69 apartments, microunits. Using the TOC incentives and producing 11.5% ELI.⁶
5. 1601-1647 N. Las Palmas Ave: 35% Low Income. Regional Center, 202 apartments, 69 units of Low Income Housing using SB 35 incentives and increase in FAR to 4.25 from 2 and 3.

The proposed CPIO bonuses to 4.5 FAR are more generous than existing incentives and hence projects are likely to be *even more feasible under the proposed CPIO*. The CPIO streamlines housing approvals and increases the site plan review threshold to 200 units rendering more housing projects ministerial. Additionally, the plan does not require parking for projects utilizing incentives in the Regional Center (not all parcels currently qualify for this incentive) and should override density limitations in the Hollywood Redevelopment Plan.

Increasing base FAR will undermine affordable housing production

Property owners and developers face several important decisions when deciding whether, and how to redevelop a parcel of land, the most important being analyzing what the highest and best use for the parcel is. Should the developer build housing, a hotel, offices, or studio space? What is the best of mix of uses?

The developers most active in Hollywood generally develop all types of uses. Relevant Group, the developer of several recently built hotels in Hollywood, is also developing a housing project on Las Palmas. CIM Group, which has developed several residential properties in Hollywood also develops hotels. Related, which is developing an office project in Hollywood, also develops large multifamily apartments. Onni Group is developing both housing and office in Hollywood. *Our choices in the Hollywood Community Plan will determine what developers decide to build, and whether or not they will take advantage of affordable housing incentives or develop 100% market rate housing or take advantage of on-menu density bonus and provide less affordable housing than required under the CPIO.*

Increasing the FAR will crowd out housing development and undermine use of the incentives. Upzoning will increase land value, and the discussed upzone to a Base FAR of 4.5 is untethered to any form of value capture that can minimize the impact on land value and incentivize development, rather than provide a windfall to the current owners of the land.

The increase in land value will particularly constrain affordable housing developers, who already face significant challenges in acquiring land. Unlike market rate developers, affordable housing developers cannot recoup any increased costs through increased rents. Affordable housing developers are a significant producer of housing in Hollywood. Since 2018, (the year after TOC incentives came into effect and the passage of the value capture ordinance significantly upgraded the density

⁶ <https://urbanize.city/la/post/micro-unit-apartments-break-ground-near-hollywood-highland>

bonus program) at least 47 entirely affordable housing projects have been proposed in Hollywood through planning entitlements, amounting to 855 units.⁷ This amounts to 16.3% of the total housing projects in Hollywood during that time and 12.7% of the total units. A base increase to 4.5 is particularly attractive for commercial developers, as luxury hotels, office space is feasible at 4.5 FAR and several projects have sought and received discretionary entitlements to increase FAR to 4.5 or lower.⁸ Such projects could crowd out housing and would not provide additional community benefits, like publicly accessible open space or historic preservation benefits allowed under the draft plan.

Additionally, increasing the base FAR will undermine affordable housing production in favor of 100% market rate projects. As pointed out previously, the proposed Artisan Hollywood Project at 1520 N. Cahuenga Blvd would be able to be built with 0 affordable housing set-aside if the Base FAR is increased to 4.5. While most rental housing projects in Hollywood are now built with incentives, areas with high base FAR are more likely to see projects with no affordability. For example, the 1735 St Andrews Pl Project (Base FAR allowed is 4.5) did not include any affordable housing or use density bonuses, but at a Base FAR of 2 it would have been incentivized to use TOC or Density Bonus.⁹ Maintaining the base FAR while allowing developers to access generous bonuses incentives in exchange for affordability is the best path to equitable development in our Regional Center.

Increasing the Base FAR may also encourage projects to use incentives that allow dramatically lower levels of affordability than TOC or the CPIO, similar to projects submitted prior to the passage of Measure JJJ. The Modera Argyle Project (submitted prior to JJJ's effective date), a 7 story project in the RC1B area, only required less than 5% of its total units to affordable for Very Low Income (VLI) households being having same characteristics (a midrise building) or even more significant density. It would have required at least 14% VLI units under Measure JJJ / the TOC standards. Increasing the base FAR would take us backwards. Like Modera Argyle, a project could increase the base FAR by 20% (5.4 FAR). and set-aside less than 5% of the total units for very low-income people. A project could seek a 35% density increase and an increase in FAR to 6 using density bonus incentives, and only have less than 10% of the total units for very low income people, in contrast to the 14% VLI requirement for an increase to 4.5 under the CPIO and existing TOC incentives. Under the draft CPIO, an increase to an FAR of 6 would require 10% ELI or 14% VLI and additional 4% Low Income. Increasing the Base FAR will take us backwards

⁷ <https://planning.lacity.org/resources/housing-reports>

⁸ See Selma/Wilcox Hotel (FAR to 3.7- <https://planning.lacity.org/StaffRpt/InitialRpts/CPC-2016-2601.PDF>), <https://planning.lacity.org/StaffRpt/InitialRpts/CPC-2016-2601.PDF>>, Tommie Hotel (FAR to 3.83) <https://planning.lacity.org/pdiscaseinfo/document/MTcxMzc50/03b6cd7a-61f3-4d27-8bc5-9bb6e20119bc/pdd>, Academy Square Creative Offices (<https://planning.lacity.org/eir/academysquare/DEIR/DEIR%20Sections/II.%20Project%20Description.pdf>)

⁹ <https://planning.lacity.org/eir/nops/1375SaintAndrews/1375StAndrewsInitialStudyFinal.pdf>

to the days when ad-hoc upzoning produced inconsistent and too low levels of affordable housing.

New CPIO will encourage affordable housing and other community benefits

The aforementioned McKinsey Report concluded that given the appropriate policy choices, Los Angeles could gradually increase set-aside requirements¹⁰ to reflect savings from new housing types and lower-cost construction methods and pointed out the value of streamlining development to decrease costs. The incentives in the RC1B subarea do just that. In the RC1B subarea, the proposed CPIO rids Hollywood of the legacy of Hollywood's 1980s era downzoning, allowing increases to as much as 6.5 FAR (greater than generally applicable maximum of 6 in Height District 2) while appropriately tying the increases to additional affordability. As demonstrated by the recent Relevant Group Project at 1601-1647 N. Las Palmas Ave, with 35% Low Income units at 4.25 FAR (significantly greater than the affordability required to go to 6.5 FAR under the draft CPIO, no more than 29% Low Income or 10% ELI, 6% Low Income.), given the proper incentives developers can and will provide more affordable housing. The CPIO incentives provided to projects seeking a max bonus of 6.5 FAR are substantially greater than those currently afforded to SB 35, TOC, and Density Bonus Projects. The CPIO allows an increase in FAR to 6.5 in exchange for a maximum additional 6% Low Income Set-aside (or 9% Moderate or Above Moderate affordable set-aside), it makes projects of less than 200 base units (likely 360-400 total units) ministerial significantly cutting approval time even relative to TOC and SB 35 (where projects are subject to review by the Planning Commission), it allows the use of additional incentives without Planning Commission Review, and extends the abolition of parking requirements for residential uses to more parcels.

These significant incentives and the additional affordability requirements modestly build upon TOC, rather than undermine it and are the best way to encourage affordable housing and other community benefits in the area.

Hollywood's most important need is affordable housing for the essential workers that have kept society functioning during the pandemic. Los Angeles has an important opportunity to build upon the successful TOC program and build, with no public subsidy, additional affordable housing units.

The best way to do that is to build upon a successful bonus program, rather than increase the Base FAR and jeopardize utilization of affordable housing incentives and crowd out housing development. Please support a Just, Equitable Hollywood.

¹⁰ The McKinsey report estimates that with proper incentives, some housing projects could achieve 35% affordability for Extremely Low Income Units. The requirements in the CPIO fall far short of this while providing significant incentives.

Sincerely,

Gary Blasi
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UCLA

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UCLA



Planning CPC <cpc@lacity.org>

Hollywood Community Plan

Philip Hart <hartpshow@aol.com>
To: cpc@lacity.org

Tue, Mar 9, 2021 at 5:39 PM

I would like to see the work done on the Hollywood Community Plan be supported by elected officials and the community at large. This is our second recent go round with this plan. Vast improvements have been made with this second version and I hope it can be adopted. Thank you in advance for your cooperation.

Philip S. Hart, PhD
Los Feliz
Member, Hollywood Chamber of Commerce
Tanya Hart Communications, Inc.
Hart Realty Advisors

Sent from my iPhone

March 11, 2021

BY EMAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear President Millman and Members of the Los Angeles City Planning Commission,

I am writing on behalf of Kilroy Realty Corporation (“Kilroy”) to provide comments on the draft Hollywood Community Plan Update (the “Plan”) and the draft Community Plan Implementation Overlay (“CPIO”) released on February 10, 2021. We are a major stakeholder in Hollywood, owning several large projects: Columbia Square, On Vine, and the Sunset Media Center at 6255 Sunset Boulevard.

First and foremost, I want to applaud staff on getting the Plan to this point. I recognize that this has been a long and contentious process that requires balancing the needs and wants of many differing stakeholders. Overall, we are supportive of the plan, but have some suggestions for improving it further.

As you know, one of the most pressing problems in the City is a lack of housing. We need more housing at all levels of affordability. To that end, I strongly support the Plan’s language raising the Site Plan Review threshold increased to 200 units for affordable housing projects. I would encourage you to extend that threshold to all housing projects and consider raising it even higher. We need as much housing built as possible, as quickly as possible, and Site Plan Review serves little functional purpose other than to create delay and add costs to a project. Raising the threshold makes sense – projects that comply with the new, updated zoning and request no other discretionary actions should not get delayed by CEQA and subjected to extortionate demands.

Finally, we have written several letters in the past calling attention to the Plan’s downzoning of our On Vine project (full city block bound by Vine, Homewood, Ivar and De Longpre). The project, as built has a FAR of just under 3.25 based on the current zoning. The Plan reduces the maximum FAR for the site to 3.0, making the project legal nonconforming just months after receiving its Certificate of Occupancy. **We respectfully request that you revise the maximum FAR for the On Vine site to 3.25.**

Thank you for considering our comments.

Respectfully,

Phillip Tate

Phillip Tate
SVP, Development & Government Affairs



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

Delivered via electronic mail.

March 15, 2021

RE: CPC-2016-1450-CPU -- Hollywood Community Plan

Dear Honorable Commissioners,

We are pleased to offer the following specific policy recommendations to maximize equity and inclusion in the Hollywood Community Plan update. As outlined in detail below, we urge the Commission to take care not to disrupt carefully calibrated value capture standards, strengthen tenant protections and preserve affordable housing, and eliminate unjust barriers to legal sidewalk vending.

Public Counsel is the nation's largest pro bono public interest law firm, and the Southern California affiliate of the Lawyers Committee for Civil Rights Under Law. Our Community Development Project maintains a specific focus on producing and preserving affordable housing. In this capacity, we have been deeply involved in the development of state and local policy aimed at advancing equitable development, including but not limited to state density bonus law, the City of Los Angeles Linkage Fee, Measure JJJ and the TOC Program, and the South and Southeast LA Community Plans.

Community Plans are so important. As the City grapples with institutional racism and structural injustice, we applaud the Department of City Planning for acknowledging the deep harms that past land use and planning policies have inflicted on low-income communities and communities of color. As the City commits to repairing these harms, the Community Plans are a tool to do just that. As the framework for growth, development and investment in Hollywood for years to come, this Plan must center the needs and priorities of those communities that have been most harmed. To advance a more inclusive and equitable Community Plan, we offer the following specific recommendations.

1. Create mixed income and affordable housing by maintaining the base FAR at 3:1 in the Regional Center Subareas.

We strongly urge the Commission to not increase the Base FAR in the RC1B subarea, as was proposed and considered during the February 18 hearing. Increasing the Base FAR in RC1B could have the unintended and deeply unfortunate consequence of creating less housing overall and no affordable housing at all. It may seem paradoxical to promote denser development by *not* increasing the base FAR, but it is actually quite critical to a functional value capture program. We recommend retaining 3:1 FAR for the Base because we want to effectively encourage the creation of denser mixed-income and affordable development at a higher Bonus FAR.

The inherent danger in increasing the Base FAR without corresponding affordability is expounded by a recent study from USC researchers evaluating LA's Transit Oriented Communities (TOC) Program. First, the study found that the TOC Program's affordability levels are "feasible"—in that the Program produces a rate of return that developers find acceptable for investment—in most neighborhoods. This was not particularly shocking, as the Department's Housing Progress Dashboard demonstrates widespread use of the Program. More importantly, the study assessed whether (and where) the rate of return for TOC projects is the same or greater than the rate of return for developing at the base density without any affordable housing. This is a key question for value capture zoning: *is it more beneficial to create denser development with on-site affordable housing than it is to create smaller buildings without affordability?* The USC study concludes that in moderate low-markets (e.g. Boyle Heights) and strong markets (e.g. Hollywood, Westwood, and Downtown), the TOC Program's affordability and density standards are calibrated such that the rate of return exceeds the investment threshold, and is greater for mixed-income projects (the Bonus) compared to smaller 100% market projects (the Base).¹ In fact, the study found that "a higher provision of affordable housing is feasible in moderate-strong and strong rental markets for all affordability tiers."

What does this mean for the Hollywood Community Plan? It demonstrates the crucial importance of calibrating Base and Bonus densities in a way that makes it more attractive to build at the mixed-income Bonus level. For the RC1B subarea, the current Draft Plan sets a Base FAR of 3:1, with a "Bonus FAR" of 4.5:1 for projects that meet TOC Tier 3 affordability levels, and a "Level 2 Bonus FAR" of up to 6.5:1 for projects that add additional corresponding affordability levels. The draft CPIO also provides a greater than 100% residential density increase to projects that include affordable housing.² This structure provides a higher (i.e. more valuable) density allowance than offered by TOC. As a result, based on the USC Study, we can be confident that the calibration makes it more attractive to develop at the Bonus FAR with on-site affordable housing. However, if the Base FAR is increased to 4.5:1, with only one Bonus FAR option at 6.5:1, then the CPIO would offer only a 44% FAR increase. This is a lower FAR increase than offered by TOC. As a result, the proven TOC calibration would be disrupted and it could very likely flip and become more financially beneficial to develop at 4.5:1 FAR *without any affordable housing* (or perhaps develop a different use and not create any housing).

In summary, retaining the base FAR at 3:1 will result in more mixed-income projects being developed at the Bonus FAR of 4.5:1 or 6.5:1, yielding more housing overall and more affordable housing. Conversely, increasing the Base FAR to 4.5:1 may result in more 100% market-rate projects (or non-residential uses) being developed at 4.5 FAR without creating any affordable housing. **To the extent the Commission's goal is to build more housing and more affordable housing, the Base FAR should remain at 3:1.**

¹ Marlon Boarnet, et. al., "Los Angeles' Housing Crisis and Local Planning Responses: An Evaluation of Inclusionary Zoning and the Transit-Oriented Communities Plan as Policy Solutions in Los Angeles." <https://www.huduser.gov/portal/periodicals/cityscape/vol23num1/ch5.pdf>

² From 1 unit per 400 square feet to 1 unit per 115 square feet.

In addition to the important policy reasons to retain the Base FAR – namely creating more housing and more affordable housing – we also remind the Commission that Measure JJJ explicitly prevents new Community Plans from reducing the capacity for the creation or preservation of affordable housing or undermining density bonus law or any other affordable housing incentive program.³ Increasing the Base density to upzone without affordability directly undermines density bonus and value capture incentive structures. With this legal standard in mind, we ask the Commission to ensure that *Base* densities remain the same as under current zoning, but with an overlay of *generous Bonus FAR* allowances for mixed income projects. This is the recipe for careful upzoning that is aligned with community benefits to produce the mixed-income and affordable housing that Hollywood so desperately needs.

2. **Incorporate strong anti-displacement measures.**

In addition to setting the appropriate Base and Bonus FAR levels, the CPIO should also be amended to include stronger anti-displacement protections. We propose the following specific amendments to protect tenants, preserve the affordable housing stock, and maximize inclusive development without displacement.

a. Strengthen Replacement Requirements.

We recommend that the CPIO replacement requirements be amended to clarify that any RSO units be replaced with covenanted affordable housing units occupied by lower income households. Under current city implementation, demolished RSO units occupied by lower income households are replaced with affordable units, but RSO units occupied by Moderate or higher income households are replaced pursuant to the RSO, which enables vacancy decontrol and new units offered at market rate. This is not required. State law explicitly enables the City to require any RSO units occupied by persons or families above lower income to be replaced with units affordable to and occupied by low-income persons or families.⁴ Moreover, in order to avoid incentivizing the demolition of RSO units and to ensure a net gain of affordable housing in Hollywood, we encourage the Commission to consider making RSO replacement units additive to the CPIO set-asides. These important policy changes can be achieved with the following amendment to CPIO Section 1-8 B.1.c:

Housing Replacement. Projects that qualify as CPIO Affordable Housing Projects must meet ~~any applicable~~ the housing replacement requirements of California Government Code Section 65915(c)(3) as amended from time to time, as verified by the Department of Housing and Community Investment (HCIDLA) prior to the issuance of any building permit. Any units subject to the Rent Stabilization Ordinance deemed or presumed to be occupied by persons or families above lower income shall be replaced with units available at affordable rent or affordable housing cost to, and occupied by, low-income persons or families. Replacement housing units required per this section ~~may also~~ shall not count towards the other On-Site Restricted Affordable Unit requirements.

³ Los Angeles Municipal Code Section 11.5.8.A.

⁴ California Government Code 65915(c)(3)(C)(i).



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b. Adopt a Community Plan-wide universal replacement and return requirement.

As currently drafted, the replacement requirements only apply to CPIO Affordable Housing Projects. This means that any project not participating in the CPIO incentive structure would be able to demolish RSO and affordable housing without meeting the above replacement requirements. And even those projects that participate in the community benefits program, while subject to replacement, may not be subject to a right of return policy. This is because while SB 330 applies a replacement and return requirement to discretionary approvals, City implementation policy does not currently extend this protection to by-right approvals. This leaves a big gap in protections that is only made larger by the Draft Plan's increase of the Site Plan Review threshold from 50 to 100 units in the Corridors Subarea and 200 units in the Regional Center Subarea.

By increasing Site Plan Review threshold, even more developments will become by-right and therefore not subject to the SB 330 replacement or return requirements. Projects that participate in the CPIO community benefits program would be subject to the CPIO replacement requirements but not the SB 330 right to return. Projects that opt not to participate in the community benefits program could destroy RSO units without a replacement requirement or the SB 330 right to return. To close these loopholes, we recommend the Commission direct that *all new development* in the Community Plan Area be subject to replacement requirements and right to return.

This policy protection should not be delayed for a "citywide discussion." It is the Community Plan that is increasing the Site Plan review threshold, which significantly increases the likelihood that many more projects fall outside the coverage of SB 330. It cannot be the case that modifying Site Plan Review (a citywide program) is appropriate for a Community Plan, but replacement and right to return is not. Piecemealing these policies could result in numerous units being demolished and tenants permanently displaced. Because of the interplay with SB 330, the Community Plan should also include universal application of a strong replacement and right to return requirement.

c. Include new Policies and Programs to regulate demolitions and condo conversions and monitor changes to the affordable housing stock.

There are also thousands of existing affordable and rent stabilized units in Hollywood, many of which are at constant risk of being lost to conversion or demolition. To address this important but often overlooked dimension of our affordable housing crisis, the Plan should include Policies and Programs that specifically address preservation of the existing affordable and rent stabilized housing stock. These proposed Policies are proven and effective strategies, and are necessary to ensure a net gain of affordable units in the Hollywood community. We urge the Commission to direct that the following Policies and Programs be included in the Plan:

LU [#].[#] Residential Conversions. Residential Conversion Projects, as defined in LAMC Section 12.95.2, shall be denied if the vacancy rate in the Community Plan Area is five percent or less, or the vacancy rate in the Community Plan Area is unknown, or if the cumulative effect on the rental housing market is significant. In any event, the maximum number of units converted as part of a Residential Conversion Project in the Community Plan Area shall not exceed 50 per 12-month period.



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LU [#].[#] Residential Demolition Annual Allowance. Adopt an ordinance establishing an annual cap on demolitions of RSO units based on an appropriate percentage of the RSO housing stock in the Community Plan Area.

LU [#].[#] Residential Demolition Permits. No permit for residential demolition in the Community Plan Area shall be issued unless all necessary building permits have been issued for new construction on the site.

LU [#].[#] Minimize the Harmful Impacts of Ellis Act Displacement. Develop programs and resources to increase enforcement of Ellis Act notice requirements and re-rental restrictions, explore options to strengthen right of return and prioritize new affordable housing opportunities for households displaced by Ellis Act evictions.

[program number]	[number description]	[responsible agency]
<u>PXX Demolitions:</u>	<u>Promptly establish and implement monitoring and waitlist procedures to prohibit new residential demolition permits unless and until all necessary building permits have been issued for new construction on the site, and adopt an ordinance establishing an annual cap on demolitions of RSO units based on an appropriate percentage of the RSO housing stock in the Community Plan Area.</u>	<u>HCIDLA</u>

[program number]	[number description]	[responsible agency]
<u>PXX Residential Conversion Annual Allowance:</u>	<u>Promptly establish and implement monitoring and waitlist procedures to deny residential conversion projects if the vacancy rate in the Community Plan Area is five percent or less, or the vacancy rate in the Community Plan Area is unknown, or if the cumulative effect on the rental housing market is significant, and implement an annual allowance of no more than 50 residential conversions in the Community Plan Area per 12 month period.</u>	<u>HCIDLA</u>

[program number]	[number description]	[responsible agency]
<u>PXX Housing Stock Monitoring Program:</u>	<u>Create a multidepartment working group to establish and implement a comprehensive monitoring program that will develop an inventory and track changes to the stock of units that are covenanted affordable, rent stabilized, and/or occupied by lower-income households, as well as trends relating to Ellis Act evictions, condominium conversions, demolitions, tenant buyout agreements, evictions, and other indicators of potential loss of affordable and rent stabilized housing.</u>	<u>HCIDLA</u>

d. Ensure adequate review and regulation of hotel projects.

The Community Plan should include steps to prevent displacement of low-income households due to hotel development, and to properly evaluate and incorporate community input into new hotel development in the Community Plan Area. We support the Just Hollywood Coalition recommendations for an upgrade Conditional Use Permit process.

3. Eliminate discriminatory barriers and create opportunities for sidewalk vendors.

The Draft Community Plan includes numerous policies to support small businesses and local entrepreneurs, however there is no mention whatsoever of sidewalk vending. This perpetuates a long-standing City policy of excluding sidewalk vendors from the Hollywood small business economy. We urge the Commission to use this Plan update as an opportunity to advance a more inclusive Hollywood economy that welcomes and supports low-income entrepreneurs like sidewalk vendors.

Despite legalizing sidewalk vending in late 2018, the City's ordinance created a "No Vending Zone" that covers any sidewalk on or within 500 feet of the Walk of Fame. At the time, this exclusion was proposed and justified on health and safety grounds. However, the City's new sidewalk dining initiatives have actively encouraged restaurant sidewalk dining infrastructure on the Walk of Fame. The City's Al Fresco program imposes an *18 inch* buffer around Walk of Fame stars for restaurant tables and chairs,⁵ but a *500 foot* buffer for sidewalk vending, despite the fact that restaurant dining infrastructure actually takes up more sidewalk space than sidewalk vending. This wildly different standard has a disproportionately negative impact on the mostly immigrant low-income street vendor workforce, and is a de facto admission that the City's prohibition of sidewalk vending in that same space is not directly related to objective health, safety and welfare concerns.⁶

To eliminate this blatantly discriminatory barrier to economic opportunity, and to better support sidewalk vendor entrepreneurs in Hollywood, we urge the Commission to direct the following new Policies and Programs be included in the Plan.

LU [#].[#] Repeal the No Vending Zone along Hollywood Boulevard and create a "Special Vending District" that enables safe, regulated sidewalk vending, with regulations that reflect unique local circumstances at and near the Walk of Fame.

⁵ LA Al Fresco Sidewalk Dining Program Rules and Guidelines, Rule 12. <https://engpermitmanual.lacity.org/other-boe-permitsprocesses/technical-procedures/00-la-al-fresco-sidewalk-dining-program-rules-and>

⁶ See, Government Code Section 51038(c) ("A local authority may, by ordinance or resolution, adopt additional requirements regulating the time, place, and manner of sidewalk vending if the requirements are directly related to objective health, safety, or welfare concerns, including, but not limited to, any of the following: [...]"), and Government Code Section 51038(e) ("For purposes of this section, perceived community animus or economic competition does not constitute an objective health, safety, or welfare concern.")



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[program number]	[number description]	[responsible agency]
<u>PXX Hollywood Boulevard Special Vending District:</u>	<u>Repeal the No Vending Zone on Hollywood Boulevard in LAMC 42.13 and establish a working group of Hollywood sidewalk vendors and community stakeholders to develop a Special Vending District for the Walk of Fame that allows sidewalk vending activity within local-specific regulations that promote ADA access, safe passage and inclusive economic opportunity.</u>	<u>DCP/BSS</u>

LU [#].[#] Support sidewalk vending as a means to enhance the public realm, create entrepreneurship and economic mobility opportunities, and provide affordable retail in the Hollywood community.

LU [#].[#] Encourage street vending in parks and other public open space to promote economic opportunity and activate public space with nourishing food and culturally significant products.

LU [#].[#] Encourage the development of new commissaries and commercial kitchens, as a new or accessory use, to support low-income street vendors in accessing permits and sustaining their business.

[program number]	[number description]	[responsible agency]
<u>PXX Commissaries and Commercial Kitchens::</u>	<u>Study and develop new strategies to increase the availability of commissary and commercial kitchen space for lowincome sidewalk vendors, including incentives for new commissaries and by-right approval of commissaries as an accessory use at existing schools, restaurants and churches</u>	<u>DCP/BSS</u>

The Hollywood Community Plan presents an important and timely opportunity to establish a framework for equitable growth and a just recovery. If done right, this Plan can protect current low-income Hollywood residents, create new opportunities for safe and affordable housing, open the economy to low-income entrepreneurs, and establish a model for equitable community planning. Thank you for considering these recommendations and please reach out with any questions.

Sincerely,

Doug Smith
Supervising Senior Staff Attorney
dsmith@publiccounsel.org

cc: Vince Bertoni, Craig Weber, Priya Mehendale, Linda Lou, Sophia Kim, Quetzalli Enrique

March 14, 2021

Chair Samantha Millman
Honorable Commissioners
Los Angeles City Planning Commission
200 N. Spring St.
Los Angeles, CA 90012
cpc@lacity.org

RE: Hollywood Community Plan, CPC-2016-1450-CPU, Item #6

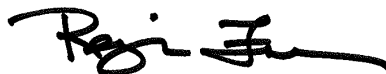
Dear Commissioners,

As a former Vice President of the Planning Commission, I am writing to urge you to support the 'Just Hollywood Plan' and oppose any attempts to undermine the successful Transit Oriented Communities Program. I sat on the Planning Commission the last time Los Angeles attempted to update the Hollywood Community Plan. At that time, our Commission consistently pursued adequate provision of affordable housing, but our tool kit for addressing the issue was not nearly as robust as it is now. We've made great improvements since that time- the proposed draft is significantly better than the version we adopted in encouraging affordable housing and other community benefits like publicly accessible open space. Please do not undermine this progress. Increasing Base FAR to 4.5 will undermine the production of affordable housing and the whole community benefits system in the Regional Center. Rather, **Base FAR should be kept the same** in order to encourage use of the Bonus FAR and the provision of affordable housing.

We are in a severe regional crisis, and Hollywood is in particularly dire need of affordable housing and protections against displacement. Hollywood has among the greatest affordability gaps in the City of Los Angeles, the greatest difference between market rents and what community members can afford to pay.¹ We must not undermine the incentive structure that encourages affordable housing in Los Angeles. We must build on it. Maintaining the Base FAR where it is (usually 2 or 3 FAR) while significantly increasing the potential bonus to 6, does not endorse the down-zonings of the 1980s. Instead, you are pairing significant additional density with needed affordable housing, an equitable up-zone rather than one that grants a windfall to incumbent property owners without public benefit. Hollywood can set a good precedent for equitable development if you make the right choice.

Please do turn back the progress we've made. Support a Just, more equitable Hollywood instead.

Sincerely,



Regina Freer

¹ See KMA Consulting: https://clkrep.lacity.org/onlinedocs/2017/17-0274_pc_b_6-6-17.pdf, page 6



Planning CPC <cpc@lacity.org>

Please support Just Hollywood Plan—Hollywood Community Plan (Item #6)

Steven Luftman <sluftman@yahoo.com>

Mon, Mar 15, 2021 at 10:42 AM

To: Paul Koretz <paul.koretz@lacity.org>

Cc: daniel.skolnick@lacity.org, Jeff Ebenstein <jeffrey.ebenstein@lacity.org>, cpc@lacity.org

Dear Councilmember Koretz,

I'm writing in support the Just Hollywood Plan.

The requirement for Hotel conditional use permits appealable to Council is important. Hotel projects potentially have detrimental impacts on displacement of renters, homes, small business, and social services.

The requirement for TOC/CPIO projects to require replacement of RSO units in addition to the affordability requirements is very important to me. This idea came out of my work as a tenant activist, repeatedly I witness more RSO units lost than the affordable units that these projects created.

On a side note, I am running for Mid City West Community Council's board, and would appreciate your vote!

Thank you for your consideration,

Steven Luftman
310-03-9958

March 16, 2021

VIA ELECTRONIC MAIL ONLY

Los Angeles City Planning Commission
200 North Spring Street, Second Floor
Los Angeles, California 90012
E-Mail: cpc@lacity.org

Re: J&J Hollywood and The Hollywood Kress LLC's Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Honorable Commissioners:

We represent J&J Hollywood in collaboration with The Hollywood Kress LLC who are the owners of the properties located at 6608-6612 and 6622-6624 W. Hollywood Boulevard and APN Nos. 5547015004 and 5547015028 (collectively "Property Owner"). This letter serves as our comment on the updated draft Hollywood Community Plan Update ("Plan") and the Community Plan Implementation Overlay ("CPIO"), released in February 2021 by the City of Los Angeles ("City"), which will be considered by the City Planning Commission ("Commission") on March 18, 2021.

As discussed below, the Property Owner seeks to maximize the future viability of APN No. 5547015004 and the southern portion of APN No. 5547015028 (parking lot only)¹ ("Property") while balancing the Property's proximity to the Hollywood Boulevard Commercial and Entertainment District ("Historic District"). See Figure 1, below. We believe that the Property should not be included as part of Regional Center 3 Subarea ("RC3") and should have been included as part of the Regional Center 1A Subarea ("RC1A"). The Property is surrounded to the east and west by RC1A designated properties and does not contain any portion of the buildings that front the Historic District, only surface parking lots. Modifying the zoning would further the goals of the Plan and foster continued investment in this transit-rich area, while encouraging affordable housing, preserving historic resources, and creating a livable walking environment. As such, we respectfully request the Commission make the following revisions to the Plan and CPIO:

- Revise the CPIO to include the Property within the RC1A Subarea consistent with adjacent parcels south of Hollywood Boulevard, rather than the RC3 Subarea.
- In the alternative, revise the CPIO to eliminate the more restrictive development standards, including the 45-foot height limit and allow a base FAR of 3:1 and bonus FAR of 4.5:1 for the Property.

¹ APN No. 5547015028 includes the building at 6622 Hollywood Boulevard and the parking lot subject to this request. Please note that this request to re-designate this APN only includes the southern portion of the lot, not the building.

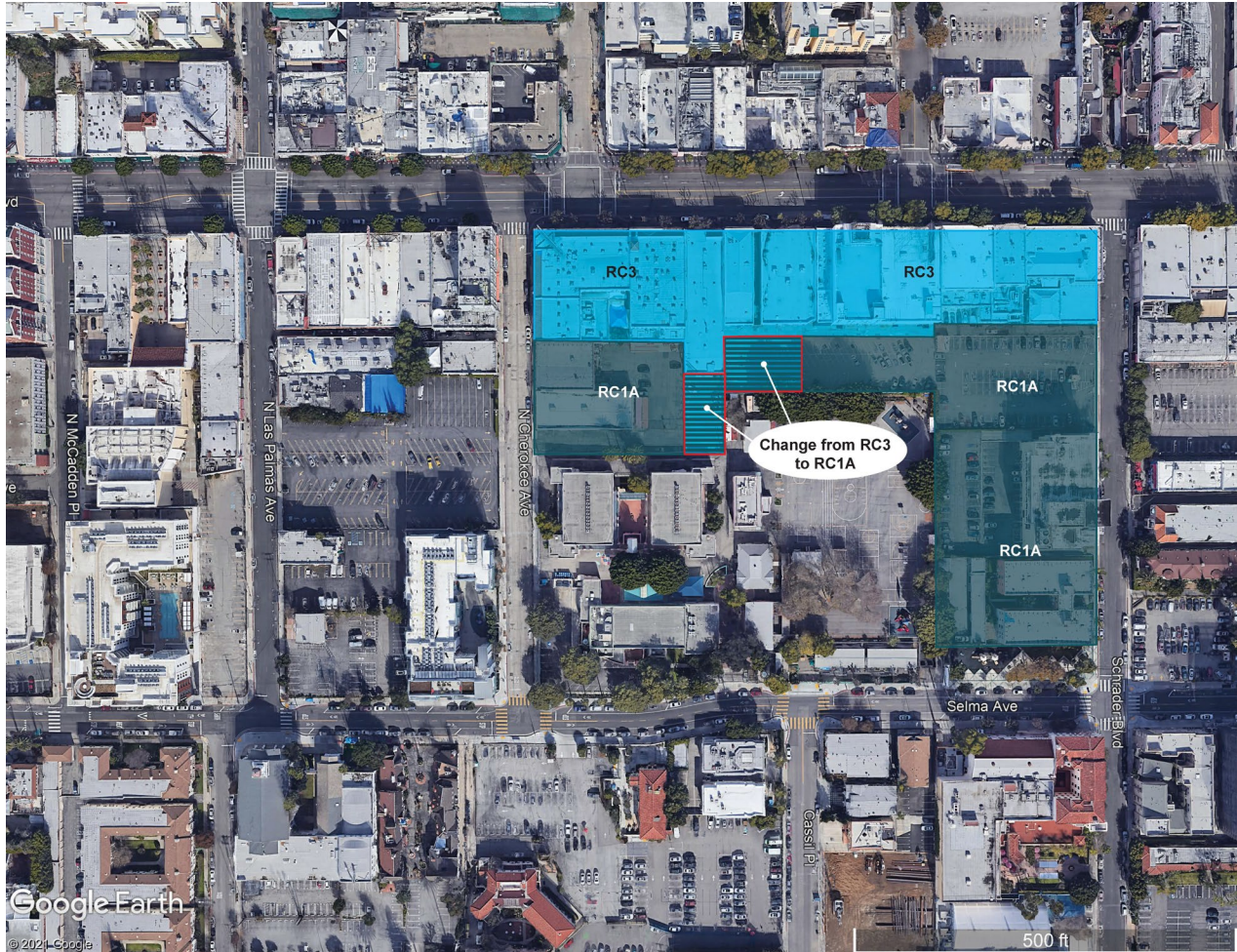


Figure 1, Proposed and Requested Re-designations for the Property

A. Existing Conditions

The Property is located on two lots south of Hollywood Boulevard between Cherokee Avenue and Schrader Boulevard. APN No. 5547015004 includes the parking lot directly south of the commercial structure at 6626-6628 W. Hollywood Boulevard (APN No.5547015001). See Figure 1, above. The building and the parking lot are on different legal lots and have separate APNs. Both lots are included as part of the RC3 Subarea. This request seeks to re-designate the parking lot only (outlined in red) from RC3 to RC1A.

APN No. 5547015028 includes both the commercial building at 6622 Hollywood Boulevard and the parking lot on the southern half of the legal lot. See Figure 1, above. The rear portion of APN No. 5547015028 consists of a surface parking lot accessible from Schrader Boulevard with no access to Hollywood Boulevard. The entire lot is proposed to be included as part of the RC3 Subarea. This request seeks to re-designate only the southern portion of the lot (outlined in red) from RC3 to RC1A and keep the northern portion of the lot RC3.

B. Proposed Revisions to the Plan

The Property Owner requests the Commission make the following revisions to the CPIO:

- Revise the CPIO to include the Property within the RC1A Subarea consistent with adjacent parcels south of Hollywood Boulevard, rather than the RC3 Subarea.

As discussed in more detail below, the Commission should incorporate the suggested amendment for several reasons. First, the Property would be better suited to the RC1A Subarea. The Property does not contain any buildings in the Historic District and should be designated as RC1A, like the other properties south of Hollywood Boulevard. All properties to the east and west of the Property are zoned RC1A. Second, the Property Owner is considering a future residential project in this area and would like to maximize much-needed residential units at the Property, consistent with the policies and objectives of the Plan. The Property is also well served by transit to support the increased density and is approximately 0.29 mile from the Hollywood/Highland Metro Station to the west, and 0.5 mile from the Hollywood/Vine Metro Station to the east. Third, allowing additional density and height at the Property would permit greater flexibility and compatible design of a potential future project and would not impact the buildings in the Historic District along Hollywood Boulevard.

1. The Property Should have a Consistent CPIO Designation with the Surrounding Properties South of Hollywood Boulevard and the Historic District

We fully support the City's decision to restrict height and density along Hollywood Boulevard and the Historic District to preserve the existing character of this Nationally Registered Historic Resource. We also agree that the limited scope of incentives permitted as part of RC3 and the CPIO strike the right balance between encouraging development while ensuring limited impacts to the buildings along the Historic District.

However, the Property does not contain any of the buildings fronting Hollywood Boulevard or included as part of the Historic District. As such, the justification for the lower FAR and height limits allowed under the CPIO for RC3 do not apply to the Property because it does not front Hollywood Boulevard and only includes the parking lots south of the buildings in the Historic District. Because the more restrictive development standards are proposed to protect the integrity of buildings in the Historic District along Hollywood Boulevard, the Property does not warrant the same protections. Allowing higher-density developments in these areas would not impact existing buildings on Hollywood Boulevard.

Additionally, the properties south of the Historic District (except the Property) are all included as part of the RC1A Subarea and have the benefit of additional height and FAR. See [Figure 3](#), below. The Property is the only area south of Hollywood Boulevard that is designated as RC3. The existing designation creates a discrepancy among similarly situated properties. The surrounding properties will be redeveloped at much higher densities than the Property, which will hinder future development and limit the potential scope of future projects at the Property.

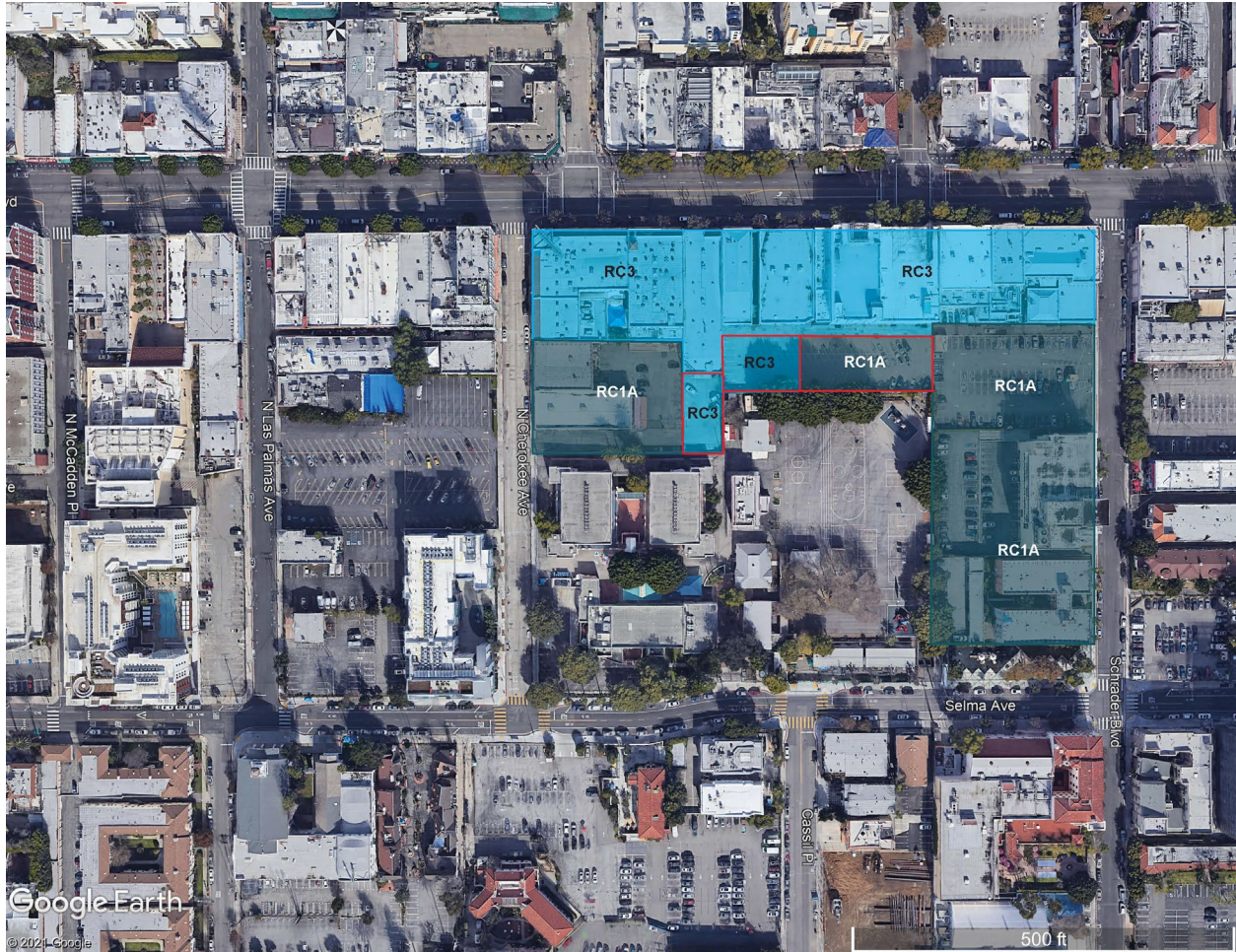


Figure 2, CPIO Designation of Projects

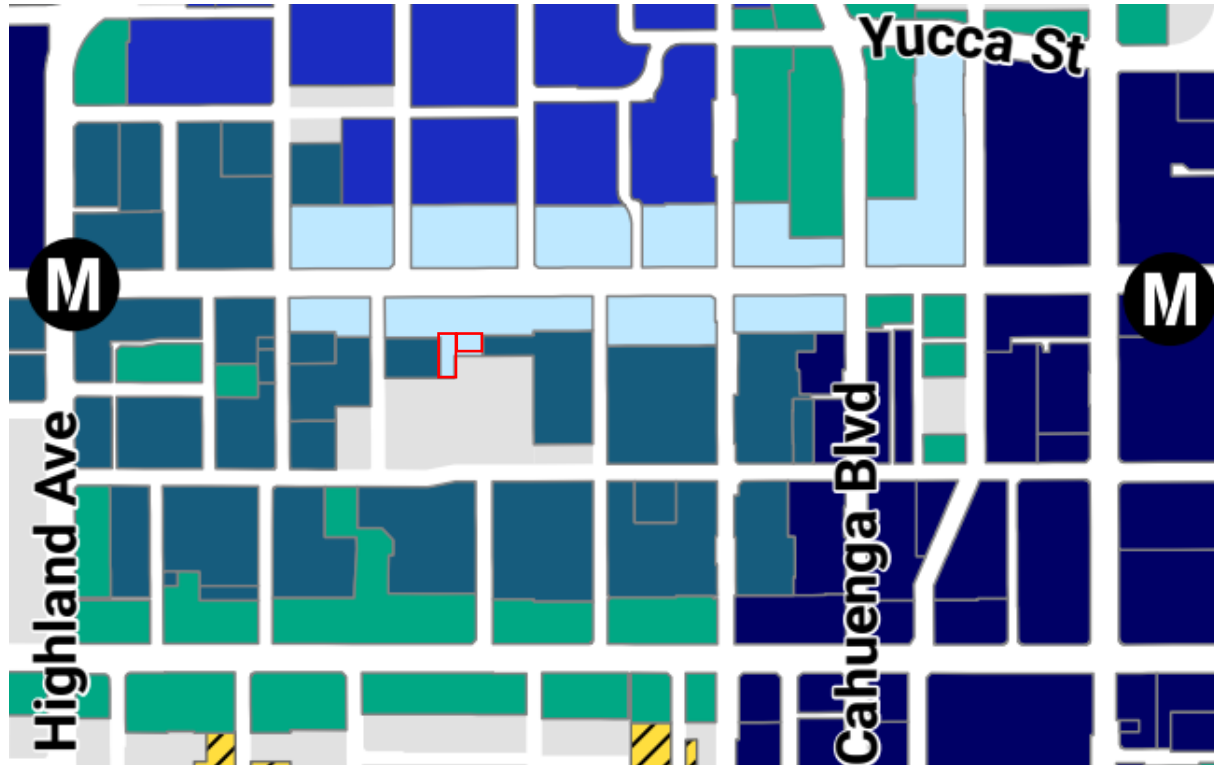


Figure 3, CPIO Designations, Property Outlined in Red

2. *The Property Needs the Additional FAR and Height in RC1A to Maximize Residential Units South of Hollywood Boulevard*

The Property Owner is considering redevelopment of the properties between Schrader Boulevard and N. Cherokee Avenue south of Hollywood Boulevard and north of Selma Avenue (“Project Site”) into a mixed-use residential project (“Project”). See [Figure 4](#), below that shows the site aerial of the Project Site. The existing uses on the Project Site are parking lots (A3 + B1) and some commercial buildings (A3 only). The Project Site includes no residential or RSO units.

The Project is preliminary, but the Property Owner is considering the bonus incentives provided by the CPIO. However, the proposed CPIO designations limit the Property Owner’s ability to develop the Project Site. For example, as shown in [Figure 2](#), the CPIO designates half of the parking lot on B1 as RC3 and the other half RC1A. This is problematic because unlike other similar properties in the area the CPIO split zones the Project Site, meaning that the western portion of B1 has a base FAR of 2:1 and a height limit of 45 feet while the eastern portion of B1 has a base FAR of 3:1 and no height limit. This effectively limits the Property Owner’s ability to

add density in this area and design a project that meets existing market demands and the needs of the community.

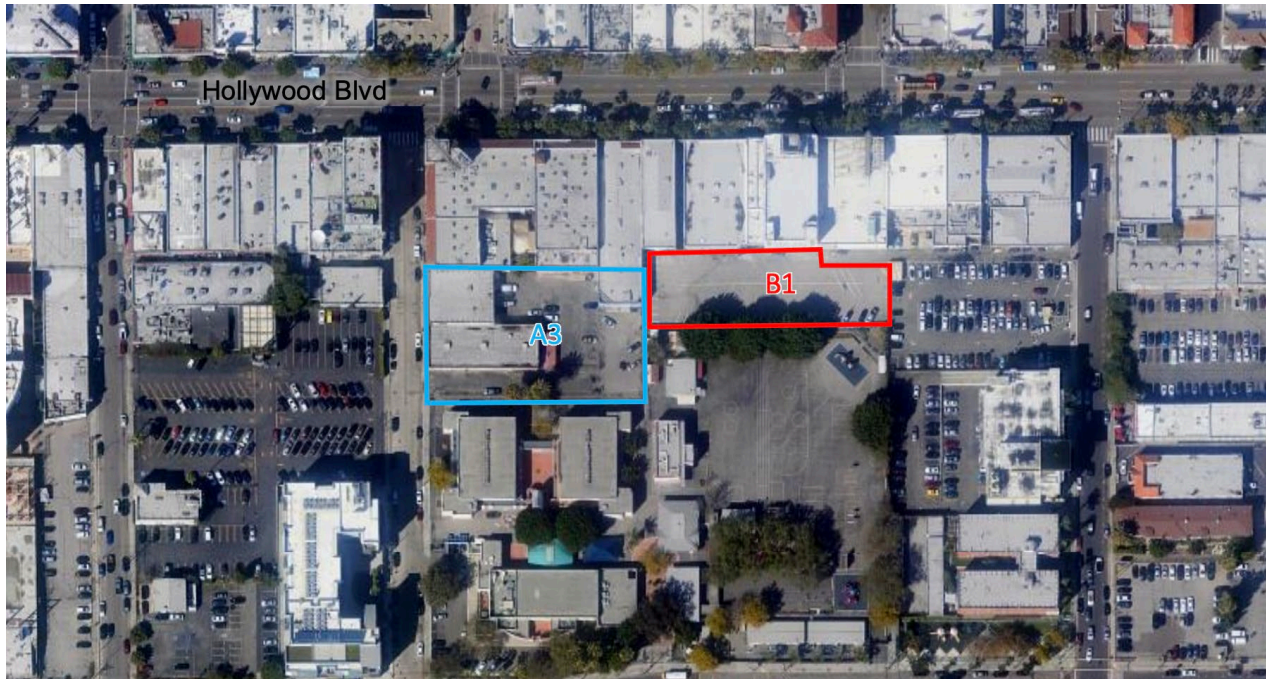


Figure 1, Proposed Site Aerial of Projects

Similarly, as shown in [Figure 2](#), the CPIO designates most of A3 as RC1A and only a small portion as RC3. This creates split zones on A3 as well, meaning that the western portion of B1 has a base FAR of 2:1 and a height limit of 45 feet while the eastern portion of B1 has a base FAR of 3:1 and no height limit. Like B1, the proposed designations restrict the Property Owner's ability to develop a meaningful project on the Project Site.

Accordingly, the requested re-designations permit the Property Owner to meet existing market demands for housing and community-serving uses in this area. The Property Owner's objective for the Projects is to fill this need by developing a high-density, mixed-use residential project. The Project would benefit from the higher FAR and no height limit because the Property Owner could construct much-needed additional market-rate and affordable residential units. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City's much-needed housing stock, but also provide job-generating uses near public transit that align with the City's current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. The Plan describes the Regional Center as "a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment, cultural facilities and supporting services."² An RC1A designation for the Property would allow more people to live and work in an area with public transit, which is much better suited to achieve the Plan's objectives.

² Draft Plan (February 2021), pp. 1-10.

3. *The Revisions Would Allow for Additional Flexibility and Compatibility with the Adjacent Historic District*

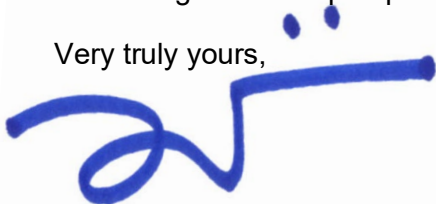
As discussed above, the re-designations are proposed in the areas shown in Figure 1, including the parking lots (or portions) south of Hollywood Boulevard proposed as RC3. The requested re-designation would allow additional height, FAR, and density south of Hollywood Boulevard, which would permit greater flexibility to integrate design interventions that protect the historic resources and allow better compatibility with new projects. In other words, buildings could pull density and height up while allowing a setback between the buildings that front Hollywood Boulevard. The Property Owner is committed to designing the Project to ensure that there will be no substantial adverse change to the significance of the buildings in the Historic District or any historic resource on the Project Site, so modifying the Subarea would not affect the significance of these resources. The Property Owner has also hired a historic resources consultant to ensure that the proposed Project will not impact the adjacent Historic District and we will be meeting with Case Management and the Office of Historic Resources this week to discuss the Project.

C. Alternative Revisions to the Plan

In the alternative, we respectfully request the Commission to include an exception in RC3 for properties that do not include any buildings in the Historic District fronting Hollywood Boulevard. Here, the Property could remain in the RC3 Subarea if the RC1A incentives are permitted, including no height limit and a base FAR of 3:1 with a bonus FAR of 4.5:1. As discussed above, because the Property does not front Hollywood Boulevard, limiting development in those areas is overly restrictive and does not serve the purpose of preserving historic design features in the Historic District. Furthermore, a 45-foot height limit and base FAR of 2:1 would reduce the density of any proposed development and limit the potential to add much-needed housing and commercial opportunities in this transit-rich area of the Regional Center. Therefore, the more restrictive development standards (e.g., FAR, height, etc.) should not apply to the Property.

For the reasons discussed above, we respectfully urge the Commission to incorporate our suggested revisions and modify the CPIO designation of the Property from RC3 to RC1A, or at minimum remove the restrictive development standards (e.g., FAR, height, etc.) from those areas. We strongly believe that these changes would serve to put Hollywood on a path of renewed growth and prosperity that would work for everyone in the community.

Very truly yours,



Alfred Fraijo Jr.
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
SMRH:4823-9642-7489.4



Angeles Chapter
3250 Wilshire Blvd. #1106
Los Angeles, CA 90010-1513

WILDLAND URBAN WILDFIRE COMMITTEE

March 16, 2021

Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012
VIA Email: hollywoodplan@lacity.org
cpc@lacity.org

**Re: Hollywood Community Plan Update, CPC-2016-1450-CPU, ENV-2016-1451-EIR
Adopt Policies to Protect Very High Fire Hazard Severity Zones**

Honorable Planning Commissioners:

The Sierra Club Wildland Urban Wildfire Committee was formed to address land use planning and other issues related to the increasing intensity and frequency of wildfires in the Wildland-Urban Interface (WUI). Our mission is to assess the risks associated with building in the Very High Fire Hazard Severity Zones (VHFHSZs)ⁱ and influence policies to reduce those dangers while protecting the environment through education, organizing, and policy change.

Despite the fact that Hollywood hillsides represent more than half the land area of the Hollywood Community Plan (Plan) (see HCP Feb 2021 DRAFT, Figure 1-1),ⁱⁱ the Draft EIR concludes that impacts related to wildfire are “less than significant.” According to wildfire experts, “to stop the destruction”ⁱⁱⁱ of our communities by wildfire we must focus on strategies that will work in our rapidly changing environment: reduce the flammability of existing communities and prevent new ones from being built in very high fire hazard severity zones.” Ninety-five percent of all fires^{iv} in the Santa Monica Mountains are caused by human ignition sources. Combined with the impacts of climate change:^v prolonged drought, hotter temperatures, lower humidity, and more frequent, persistent, and stronger Santa Ana winds, these forces have extended the fire season into a year-round cycle and will continue to cause more destructive and deadly wildfires.

We urge the City Planning Commission to recommend that the City adopt strong policies, procedures, and goals to implement hardening strategies to apply to existing development, and to prohibit new development, in VHFHSZs as part of the Hollywood Community Plan update. These policies align with recently adopted resolutions by Sierra Club California and the Los Angeles County Democratic Party:

Sierra Club California: “supports policies that prohibit new building in Very High Fire Hazard Severity Zones, consistent with established Sierra Club infill policy, to respond to increasing intensity and frequency of devastating wildfires on lives, habitat, property, infrastructure, and the environment.” (Adopted: August 22, 2020)

Los Angeles County Democratic Party: “calls on our state leaders to reconsider the approval of increased developments in Very High Fire Hazard Severity Zones near or in wildland-urban interface areas, and seeks strong regulations and limits on new structures, as these buildings have been found to increase the size and destructive nature of our state’s worst fires.” (Adopted: September 22, 2020)

A 2019 report prepared by Governor Newsom’s Strike Force charged with examining California’s catastrophic wildfires, climate change and energy warns that wildfires are not only more frequent, but more devastating. The Strike Force’s report concludes that local governments must “begin to deprioritize” new development in areas of the most extreme fire risk, reduce the incidence and severity of wildfires, and step-up community resilience and the state’s response capabilities (“Wildfires and Climate Change: California’s Energy Future”).^{vi} To accomplish this, the report recommends that we must:

- Make communities more resilient;
- Strengthen evacuation;
- Improve land use practices to reduce damage to life and property;
- Encourage other emergency planning;
- Update codes that govern defensible space.

Local elected officials have also recognized the dangers associated with continuing to build in Very High Fire Hazard Severity Zones:

- Feb. 2020 (Reduce Damage to Life and Property from Wildfires): the Los Angeles County Board of Supervisors voted to amend^{vii} Title 21 and 22 to help prevent and reduce damage to life and property in the event of extreme, wind-driven wildfires by requiring that new developments pass strict tests for egress, setting new, higher standards for length of time for safe community evacuation, mandatory denial recommendation of any project shown to compromise public safety, and denial recommendation if plan amendments would increase allowed density/intensity within fire zones.
- Oct. 2020 (Very High Fire Hazard Severity Zones County Legislative Priority): the Los Angeles County Board of Supervisors voted to oppose^{viii} new proposals that would increase housing density in Very High Fire Hazard Severity Zones. This advances Newsom’s recommendation that local governments begin to deprioritize new development in areas of the most extreme fire risk and will address the growing number of legislative bills that would allow increased density in VHFHSZs.
- June 2020: San Diego County Supervisors rejected^{ix} the more than 1,700-home master-planned community in Lilac Hills Ranch over wildfire concerns. Fire officials and county staff said the project was especially dangerous because, among other things, residents would likely become trapped on the narrow winding, rural, two-lane roads during a wildfire evacuation.

- Sept. 2020 (Council Motion 20-1213): Councilmember Mike Bonin introduced^x a motion asking for a report on the capacity, safety, and viability of existing and potential evacuation routes in VHFHSZs, to identify the policies and development standards, including land use and building restrictions, necessary to support these evacuation routes and for the City Planning Commission to submit its report after reviewing the update to the Safety Element of the General Plan.
- Nov. 2018 (Council Motion 18-1120): Councilmember Mike Bonin introduced^{xi} a motion to strengthen the City’s response to wildfires in the Wildland-Urban Interface, enhance coordination between City departments and outside agencies, and increase resiliency and recovery efforts after a major fire.
- Dec. 2019: Los Angeles City Councilmember Monica Rodriguez supported denial^{xii} of a large housing development in Verdugo Hills due to the risk of fire danger. Rodriguez said, “The subject's site topography and location within the city's very high fire hazard severity zone raises real questions about fire and life safety.”
- Oct. 2018: Councilmember Paul Koretz opposed^{xiii} a plan to build a 99-room hotel/spa in Benedict Canyon on land zoned residential in the Santa Monica Mountains saying “I'm equally troubled by the potential environmental impacts... along with the possible impact of a project this size on fire safety.”

California experienced the deadliest and most destructive wildfires in its history in 2017, 2018, and 2020. In 2017, nearly 9,000 wildfires tore through the state, burning 1.2 million acres of land, destroying more than 10,800 structures and killing at least 46 people. In 2018, a new record was set when 1.8 million acres burned. The Mendocino Complex fire earned the status as the state’s largest fire on record, reaching 459,123 acres. The fire season in 2020, however, eclipsed both 2017 and 2018 and is by far the worst fire season recorded^{xiv} in California's modern history with approximately 8,200 individual fires and more than 4 million acres burned.

Los Angeles has seen its share of major fire events during the past decade. Community members have become increasingly accustomed to voluntary and mandatory evacuations. For example, the 2018 Woolsey Fire^{xv} swept from Simi Valley, jumped the 8-lane I-101 Freeway and Agoura Roads (an approximately 350’ wide fire break), burned across the Santa Monica Mountains to the Pacific Ocean, destroying 1,600 structures, scorching almost 97,000 acres (88% of federally-owned parkland within the Santa Monica Mountains National Recreation Area burned), killing three people and prompting the evacuation of almost 300,000. The 2019 Getty Fire^{xvi} burned for seven days, destroying almost a dozen homes, threatening many more, and prompting the evacuation of approximately 10,000 people.

Inexplicably, the Hollywood Community Plan Draft EIR barely mentions fire prevention and safety measures. The City of Los Angeles must join with the state in adapting to this “new normal,” by setting goals and policies to protect public safety. The Hollywood Community Plan update presents the perfect opportunity for Los Angeles to address critical issues facing the City’s wildfire-prone areas starting with the Hollywood Hills. Adopting policies and implementation mechanisms to guide where and how we build to minimize the risk of loss of life, injury, damage to structures, and economic and social dislocations resulting from urban-area wildfires should be a *key* consideration of the Plan.

The Hollywood Community Plan must include current, science-based fire-prevention policy, new methods of minimizing damage to existing housing and other structures, and a policy that ***prohibits new building in the WUI in Hollywood***, namely the Plan's hillside areas. The Plan should also include a wildfire safety section to ensure a safe and healthy community for Hollywood residents as we combat climate change and ever-growing wildfire dangers. The Plan could then serve as an important model for other Los Angeles community plan updates with Very High Fire Hazard Severity Zone areas -- such as the Bel-Air Beverly Crest Community Plan and Brentwood-Pacific Palisades Community Plan.

The cost of not adopting sound wildfire prevention and safety policies is too great. Fires have already taken a devastating toll on:

- People: loss of life, property and pets; displacement and competition for affordable housing; public health impacts from exposure to airborne toxins and smoke; trauma to communities, and unequal vulnerability for communities of color;
- The economy: strain on resources; insurance; cleanup; collapse of infrastructure including utility lines, water storage systems, and roads;
- Ecosystems: impacts to the area's wildlife, wildlands, and habitat; climate goals setback: increases in greenhouse gases, release of toxic particles, carbon dioxide, black carbon, methane; and diminishment of air and water quality.

The Sierra Club Wildland Urban Wildfire Committee therefore urges the Los Angeles City Planning Commission to adopt explicit policies that limit new development within areas of extreme fire risk.

Sincerely,



Lynne Plambeck, Chair
Sierra Club, Angeles Chapter
Wildland Urban Wildfire Committee

cc:

CM Nithya Raman, CD-4

CM Paul Koretz, CD-5

CM Mitch O'Farrell, CD-13

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- ⁱ <https://data.lacity.org/Public-Safety/Very-High-Fire-Hazard-Severity-Zones/js76-xjtt>
- ⁱⁱ <https://planning.lacity.org/odocument/73938107-9332-404e-b2fa-75f8a0fe19ae.pdf>
- ⁱⁱⁱ https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/sierra-club-california/PDFs/GovNewsom_Wildfires_2019.pdf
- ^{iv} <https://climatechangedispatch.com/study-humans-not-global-warming-sparked-almost-all-of-californias-wildfires/>
- ^v <https://www.edf.org/climate/heres-how-climate-change-affects-wildfires>
- ^{vi} <https://www.gov.ca.gov/wp-content/uploads/2019/04/Wildfires-and-Climate-Change-California%E2%80%99s-Energy-Future.pdf>
- ^{vii} <http://file.lacounty.gov/SDSInter/bos/supdocs/143863.pdf>
- ^{viii} <http://file.lacounty.gov/SDSInter/bos/supdocs/149574.pdf>
- ^{ix} <https://www.latimes.com/california/story/2020-06-24/san-diego-county-rejects-lilac-hills-ranch-housing-project>
- ^x http://clkrep.lacity.org/onlinedocs/2020/20-1213_mot_09-22-2020.pdf
- ^{xi} http://clkrep.lacity.org/onlinedocs/2018/18-1120_mot_11-20-2018.pdf
- ^{xii} <https://www.dailynews.com/2019/12/10/200-home-sunland-tujunga-development-rejected-by-la-city-council-committee/>
- ^{xiii} <https://saveourcanyon.la/9712-oak-pass-rd-position>
- ^{xiv} <https://www.latimes.com/california/story/2020-10-04/california-fire-season-record-4-million-acres-burned>
- ^{xv} <https://www.latimes.com/local/lanow/la-me-woolsey-resources-20190106-htmllstory.html>
- ^{xvi} <https://la.curbed.com/2019/10/28/20935984/getty-fire-mandatory-evacuations-map>

TO: City Planning Commission
FROM: Neighborhood Stakeholders / Sunset Boulevard Corridor 5
CC: Hollywood City Planning Team, CD4, CD5, HHWNC
RE: NEW INFORMATION for the March 18, 2021 Meeting on the Hollywood Community Plan
DATE: March 12, 2021

Based on the 2/18/2021 meeting, is it the advice of the City Planning Commission to MODIFY the objectives of the Hollywood Community Plan and restart the process?

Per the Staff Recommendation Report, the Hollywood Community Plan is intended to achieve the following overarching objectives:

1. Provide a range of housing and employment opportunities.
2. Promote the vitality and expansion of Hollywood’s media, entertainment, and tourism industry.
3. Conserve lower-scale neighborhoods.
4. Safeguard hillside areas.
5. Create a network of safe, multi-modal linkages.
6. Promote sustainable development.
7. Preserve and enhance social, cultural, and historic identity.
8. Improve public space, parks, and open spaces.
9. Conserve neighborhoods, districts, historic/cultural resources, and public rights-of-way.

The zoning on SUNSET BOULEVARD BETWEEN FAIRFAX AVENUE AND VISTA STREET MEETS PLAN OBJECTIVES #1, #2, #3, #5, #6, #7 and #9.

We ask you to approve and recommend adoption of Corridor 5 zoning with our support for an appropriately scaled height increase ONLY for 100% affordable housing.

We can meet the plan objectives AND create the desired affordable housing. Up-zoning all main transit corridors uniformly will harm Hollywood irrevocably.

The City Planning Commission recommended that the five zoning corridors in the CPIO of the Hollywood Community Plan be restructured, potentially down to two corridors. The neighborhood stakeholders ask you to retain Corridor 5 zoning except for allowing an appropriately scaled height increase ONLY for 100% affordable housing. Alternatively, if the five corridors are condensed, we ask that you consider a third, lower zoned corridor for this portion of Sunset for the reasons set forth here in line with the Plan Objectives. Please note that during CPC public comment, there were no requests made to up-zone this corridor; all up-zone requests were directed at the Hollywood Regional Center.

PLAN OBJECTIVE #1

“PROVIDE A RANGE OF HOUSING AND EMPLOYMENT OPPORTUNITIES.”

Through years of discussion and support from the two prior CD4 offices and City Planning, the stretch of Sunset from Fairfax Avenue to Vista Street has been envisioned to become the **Sunset Spaulding Square Arts District focused on retaining our small, local and creative business tenants that currently serve the socio-economically diverse surrounding neighborhood.** The stakeholders of our neighborhood (Fairfax Avenue on the west, Hollywood Boulevard on the north, Vista Street on the east, and Fountain Avenue on the south) are a diverse mix of owners and renters of every ethnicity, orientation and income bracket. Our residents live in high and low apartment and condo buildings, bungalow courtyards, ADUs, duplexes and single-family homes. Included in our neighborhood is the **Gardner Street Women’s Bridge Housing Center**, which we proposed to CD4 as a location for homeless housing and demonstrates our community’s commitment to both housing and historic preservation. Another important neighbor is the **Gardner Street Elementary School**, which draws its students from our neighborhood and is a Title 1 school with more than half of the 400-plus students living below poverty level.

RENDERING OF THE SUNSET SPAULDING SQUARE ARTS DISTRICT

Corner of Sunset and Gardner looking West toward Sunset and Spaulding Squares



We are working to make this neighborhood livable for ALL, therefore it is critical to maintain and grow the socio-economic diversity of our local businesses on Sunset. We want to avoid further displacement of these small businesses for larger corporate chains. We currently have two five-story mixed-use developments under construction on the south side of Sunset Boulevard between Gardner Street and Curson Avenue (7500 Sunset). We lost the iconic and historically significant treasures Meltdown Comics/NerdMelt Showroom and the Parisian Florist (in the same location since 1924) to the development. Our many small business tenants were forced to leave, such as the Russian grocery and bookstore that served our Russian community. Allowing heights of 67 feet and encouraging the

development of new, taller structures requires corporate retail tenants on the first floor to be financially viable. If you drive along Sunset Boulevard to the west, you will see vacant mixed-use retail space in abundance. Our local businesses cannot afford, nor do they want these characterless spaces. **Retaining our height limit (except for 100% affordable housing) encourages adaptive reuse of buildings and keeps affordable commercial space available for lease to serve the surrounding community in a walkable manner.**

As the Commission rightly raised, we cannot predict the long-term effects of the pandemic on housing needs and street-front retail. **It's critical to also consider and assist small businesses in this environment.** Giving developer incentives to create seven-story structures along all main transit corridors without consideration of the scale and socio-economic diversity of the adjacent neighborhoods will absolutely displace our local, community-serving businesses and cause the community to be less livable and walkable.

PLAN OBJECTIVES #2 AND #7

“PROMOTE THE VITALITY AND EXPANSION OF HOLLYWOOD’S MEDIA, ENTERTAINMENT, AND TOURISM INDUSTRY.”

“PRESERVE AND ENHANCE SOCIAL, CULTURAL, AND HISTORIC IDENTITY.”

Because of their unique historical character, Sunset and Spaulding Squares are regular filming locations. We host endless tour vans with people eager to see where iconic shows and movies were filmed both now and decades ago. Retaining this important palm tree lined stretch of Sunset with hillside views as a resource for filming in Hollywood and as a popular tourist destination, both huge sources of revenue for the City, should be a priority. **If you paint all main transit corridors in Hollywood with Corridor 2 zoning, you will eliminate the architectural diversity and character of our many special neighborhood destinations.** It will look like any generic stretch of any urbanized city in America, and no one visits Hollywood to see that.

The Sunset Spaulding Square Arts District focuses on what the commercial strip features today and has historically included: independently owned music stores, art studios, services, shops and restaurants along with the guilds and production companies. **The district vision serves our broad range of socio-economic groups, appeals to the creative community, maintains a cohesive connecting point between the adjacent historic resources and apartments, preserves the character of the funky, artistic, local shopping strip and creates another notable and unique destination for Hollywood.**

PLAN OBJECTIVE #3

“CONSERVE LOWER-SCALE NEIGHBORHOODS.”

All main transit corridors do not need to be up-zoned uniformly to create the desired affordable housing. Per the Plan, height allowances should increase as you move toward the Regional Center. In the past, density bonuses have led to windfalls for property owners without commensurate benefit to the community. There is a current line of thinking that **the private market alone is not capable of delivering affordable housing because the underlying issue is the global increase in land value in urban areas, which drives up the price per square foot.** Using means that go beyond up-zoning and incentivizing developers are going to be necessary, such as putting a vacancy tax in effect immediately, preserving historic housing and exploring non-private housing options.

Hollywood is one of the most creative and internationally renowned places in the world. A ride along Sunset Boulevard is on every tourist’s list, and we should share the full array of its diverse character and creative enclaves—both OLD and NEW. We can’t serve up one long, monotonous La Brea-like corridor with one size fits all zoning. **This 100-plus year-old lower scale, historic neighborhood is an important part of Hollywood’s beginning and its subsequent history, and the proposed height, FAR and density zoning on Sunset Boulevard between Fairfax Avenue and Vista Street should be retained.**

PLAN OBJECTIVE #5

“CREATE A NETWORK OF SAFE, MULTI-MODAL LINKAGES.”

The Sunset Spaulding Square Arts District is slated for pedestrian-oriented design guidelines and a streetscape plan in the Hollywood Community Plan. See plan language below.

P24	Create pedestrian-oriented design guidelines including a possible Streetscape Plan for commercial uses that foster pedestrian-oriented scale and character for the following street segments: <ul style="list-style-type: none">•Sunset Boulevard between Fairfax Avenue and Vista Street•Melrose Avenue between Highland Avenue and Orlando Avenues, inclusive of Melrose Place•Santa Monica Boulevard between Seward Avenue and Hoover Street•Hillhurst Avenue between Franklin and Los Feliz Avenues
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See verbiage from the Staff Recommendation Report below:

With respect to Neighborhood Districts, the Framework Element states the following:

Goal 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles’ neighborhoods.

Objective 3.8: Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit.

In accordance with the Framework Element, the clustering of neighborhood-serving uses minimizes automobile trips while encouraging pedestrian-oriented districts in proximity to adjacent residential neighborhoods. **Neighborhood Districts are located at several key areas throughout the Community Plan Area. The Framework identifies Neighborhood Districts at several intersections along Melrose Avenue and Hillhurst Avenue. The Proposed Plan extends an existing portion of Melrose Avenue in the Neighborhood District east to Highland Avenue and designates a portion of Sunset Boulevard generally between Fairfax Avenue and Vista Street as Neighborhood District;** see Exhibit C for more information. The Proposed Plan includes policies that call for encouraging appropriate housing opportunities, limiting incompatible uses, and ensuring that there are a variety of uses that serve the daily needs of adjacent residential areas. The CPIO District implements the policies of the Proposed Plan by establishing pedestrian-oriented design standards that contribute to neighborhood district identity and maintain their function as providing important neighborhood-serving uses. The CPIO District also tailors regulations to meet neighborhood-specific needs. In conformance with the Framework Element, the development standards for the CPIO’s Neighborhood-Serving Subareas strive to enhance the pedestrian and aesthetic appeal of neighborhood district areas.

PLAN OBJECTIVE #6
“PROMOTES SUSTAINABLE DEVELOPMENT.”

Key findings from a Los Angeles Conservancy study show that “**preservation positively affects housing, affordability, sustainability, density and economics.**” Specifically, “Of the 35 HPOZs that currently exist, 21 have populations where there is a greater share of racial diversity than in the rest of the city.” And, “**As much as 69% of housing in HPOZs has more than one unit, with 39% providing five or more units or apartments. This makes historic neighborhoods more accessible to renters and provides a greater range of rents and significantly higher density uses.**” Historic housing is affordable housing, so preservation should be used as one of our affordable housing tactics. **Zoning should promote adaptive reuse in the appropriate areas.** A 2011 study by the National Trust for Historic Preservation found that, even if a new building is 30% more energy efficient than a historic building, **it takes between 10 and 80 years (depending on the building type) to make up for the carbon emissions expended by demolition and new construction.**

PLAN OBJECTIVE #9
“CONSERVE NEIGHBORHOODS, DISTRICTS, HISTORIC/CULTURAL RESOURCES,
AND PUBLIC RIGHTS-OF-WAY.”

The Plan is the product of five years of tedious study of Hollywood by the City Planning team, and we thank them for their dedicated efforts. Most notably, we spent years working with City Planners [Craig Weber, Priya Mehendale, and Linda Lou](#) who took the time to understand the nuances and effect of development on every parcel/street. **Increased zoning on Sunset between Fairfax and Vista without taking into consideration the feasibility, infrastructure and impact is counter to the integrity of the years-long process.** This zone has shallow commercial frontage directly abutting RD zoning thereby requiring transitional heights and making higher zoning impractical. As just one example, a 67-foot building on the NE corner of Gardner and Sunset will negatively impact the Gardner Street Elementary School by blocking all sunlight from the playground and the gardening program, create unsafe traffic conditions, and destroy a significant historical resource (Gardner Junction of the Pacific Electric Railway). Every parcel/street has a story. We need more than two zoning options; it is not a one size fits all solution.

**OUR CURRENT ZONING IS IN COMPLETE ALIGNMENT WITH THE PLAN’S OBJECTIVES.
We ask you to retain the proposed height, FAR and density zoning on Sunset Boulevard
between Fairfax Avenue and Vista Street with our support for allowing
an appropriately scaled height increase ONLY for 100% affordable housing.**

Thank you for your careful consideration of this important decision for the legacy of Hollywood.

Respectfully submitted by,

Cheryl Holland, President, Sunset Square Neighborhood Organization: hollandc@me.com

Lesley O’Toole-Roque, Board Member, Spaulding Square Neighborhood Association:
lesleyotooleroque@gmail.com

Laura Grenfell, Board Member, Sunset Square Neighborhood Organization: lbgrenfell@gmail.com

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March 15, 2021

VIA EMAIL:

Chair Samantha Millman
Los Angeles Department of City Planning
200 N. Spring St., Room 1667
Los Angeles, CA 90012
cpc@lacity.org

**Re: Draft Hollywood Community Plan Implementation Ordinance.
City Planning Case: CPC-2016-1450-CPU
3/18/21 CPC Meeting Agenda Item #6**

Dear Chair Millman and Commissioners:

On behalf of UNITE HERE Local 11 (“**Commenter**”), this Office respectfully provides comments on the Draft Hollywood Community Plan Implementation Overlay District (“CPIO”), specifically with regard to the issue of a conditional use permit for hotel uses.¹

Inequality threatens Los Angeles’ prosperity. Local 11 works to stem this rising tide of inequality, and to make our City a place of opportunity for all – a place where its members can work and afford to live. Local 11 represents more than 20,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California. Local 11 therefore is a stakeholder in this Hollywood Community Plan Update, and its members, including hundreds who live or work in Hollywood, join together with the Just Hollywood Coalition to fight for improved land use and environmental standards, more affordable housing and to maximize community benefits. This is especially need in light on the effects of the COVID pandemic on our members and their families.

I. A CUP Requirement for Hotels Is Appropriate As Part of the Hollywood CPIO

Section 13.14.B of the Los Angeles Municipal Code (Ordinance 18142) that creates the City’s authority to create CPIOs in the first place makes clear that that a Conditional Use Permit requirement can be implemented as part of the approval of a plan overlay district. It states “[w]here the provisions of a CPIO District conflict with those of a Specific Plan or Historic Preservation Overlay Zone (HPOZ), then the provisions of the Specific Plan or HPOZ shall prevail. Regulations contained in the CPIO District dealing with uses, height, floor area ratio, and/or signage shall be more restrictive than applicable regulations in the underlying zone(s) and other supplemental use districts. If the provisions of the CPIO conflict with any other

¹ See [https://planning.lacity.org/Code_Studies/CommunityPlan\(CPIO\)/CPIO_Final_Ordinance_181412.pdf](https://planning.lacity.org/Code_Studies/CommunityPlan(CPIO)/CPIO_Final_Ordinance_181412.pdf)

City-wide regulations in the Los Angeles Municipal Code or supplemental use districts other than a Specific Plan or HPOZ, then the requirements of the CPIO District shall prevail.”

This language patently allows a community plan overlay district to establish new and different use regulations for the Plan area than would otherwise exist in the municipal code, including for uses such as hotels. In fact, the ability to require CUPs as part of the approval of a plan overlay district is already acknowledged by DCP in the Draft CPIO District documents here for Hollywood. The Draft has an entire new Section I-F.L. concerning CUPs that requires the change that “[n]ew hotels in Regional Center Subareas RC1A and RC1B, RC2 or RC3 that remove existing residential units shall first obtain a conditional use permit pursuant to LAMC 12.24W.” Additionally, in Section III-1, the Draft also creates a new CUP for ground floor commercial tenant spaces that exceed more than 5,000 square feet on Melrose Ave between Fairfax and Highland, rather than relying on the CPIO exemption process.

II. Findings for the Hotel CUP Should Be Required To Ensure Housing and Transportation Impacts Are Mitigated

Hollywood has historically underproduced affordable housing, with the Hollywood Plan area experiencing a large exodus of residents due to the lack of affordable housing.² In sharp contrast, hotel and commercial development have flourished with the hotel supply doubling between 2000-2016, which will double again if hotel development in the pipeline is ultimately built.³ These hotels, as already acknowledged in the CPIO, have land use and other impacts that can justify a CUP requirement.

We believe that a CUP for all hotels in the CPIO – not just those that remove existing housing – is warranted because of impacts including traffic, social services, and ensuring the proper balance of hospitality and bonafide residential uses. A CUP process should be in place that would otherwise ensure the proposed hotel development is appropriate for the site, does not crowd-out residential development, and does not threaten existing affordable housing stock. Given these impacts, appeals should be to the City Council under LAMC Section 12.24U as is the case with other projects including those dealing with density or floor area ratio bonuses.⁴ Other jurisdictions including San Francisco have required similar CUP requirements for hotels with findings to be decided by the highest elected body.⁵

Commenters therefore request that the existing CUP requirement in the CPIO Section I-5-L be strengthened to address these impacts as follows (redline)

² Community Plan Area Demographic Profile 2010-2014, <https://planning.lacity.org/complan/CPADemographicProfile/2014HOLLYWOOD.pdf>,

³ <https://product.costar.com/home/news/shared/196759>; see also <http://onlyinhollywood.org/hollywoodinfographics/>.

⁴ Political accountability by elected decisionmakers is important. In 2016, despite a CUP requirement, the conversion of a rent stabilized apartment building to a hotel was finally approved by the Area Planning Commission. When an environmental appeal reached the City Council, it was stated that the Councilmember did not “back the hotel but saw no legal basis for granting the appeal.” <https://www.latimes.com/local/lanow/la-me-ln-hollywood-apartment-hotel-20160629-snap-story.html>.

⁵ See Section G at https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_planning/0-0-0-21892

L. Conditional Use Permits for Hotels. Hotel and transient occupancy residential structure projects that require the removal of residential units in the Regional Center subareas (RC1A, RC1B, RC2, RC3) are required to obtain a Conditional Use Permit complying with the procedures in LAMC Section 12.24 WU including the following findings:

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

b. The project takes all feasible measures to employ residents of the Hollywood Community Plan Area in order to minimize increased demand for transportation.

c. The project includes a transportation demand management plan that incorporates all feasible measures to encourage hotel workers and visitors alike to use public transportation, bicycles and other non-auto means of transportation.

d. The proposal takes into account the effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures incorporated into the project to increase demand for local goods and services.

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

f. The project will not negatively impact the affordable housing market and shall replace any removed rent stabilized housing units or affordable units on the site with affordable units

III. Hotel Projects Should Not Receive Density Bonus

As currently drafted, the CPIO incentivizes hotels over the creation of genuine housing opportunities. This should not be allowed. *We strongly believe that hotels are not deserving of density bonuses or CPIO incentives that are designed to encourage an increased housing stock.* The current Draft policy does not provide strong enough protections and any incentivization of hotel development with increased FAR must not be permitted. Therefore, Commenters insist the following change be made to Section I-8.A.2 of the Draft:

2. Applicability

Projects that utilize the CPIO Incentive System are required to provide certain types of Community Benefits, and as set forth in each of the CPIO Subareas in Chapters II through IV, and as described below:

• **Affordable Housing.** Projects with five or more dwelling units may only utilize an Affordable Housing Community Benefit.

• **Publicly Accessible Outdoor Amenity Space.** Projects with no Residential Uses may only utilize a Publicly Accessible Outdoor Amenity Space Community Benefit.

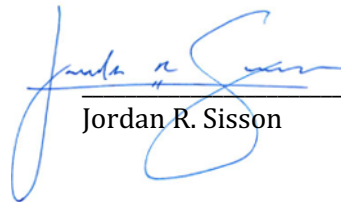
• **Relief.** Requirements of Section I-8 shall not be eligible for a CPIO Adjustment pursuant to Section I-6 C.3 or a CPIO Exemption Section I-6 C.4.

• **Limitations.** Projects including hotel or transient occupancy residential structure uses shall not be eligible for CPIO Incentives.

Commenters reserve the right to supplement these comments at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during the EIR comment period].)

Finally, on behalf of Commenters, this Office requests, to the extent not already on the notice list, for all notices of CEQA actions, Appeal hearing and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§ 21092.2, 21167(f) and Gov. Code § 65092 and LAMC § 197.01.F.) Please send notice by electronic and regular mail to: Jordan Sisson, Esq., 801 S. Grand Avenue, 11th Fl., Los Angeles, CA 90017, jordan@gideonlaw.net.

Sincerely,



Jordan R. Sisson

DAY OF HEARING SUBMISSIONS



Hollywood Community Plan Update

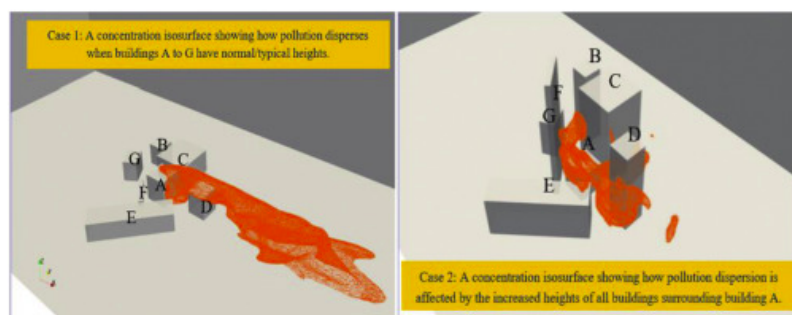
Aida Ashouri <aida.ashouri@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 3:05 PM

I would like to make a comment regarding the update. I would like to ensure that height restrictions remain in place on Hillhurst and Vermont above Sunset Boulevard and that height restrictions elsewhere are reasonable as to their effects on the climate. My reasons are as follows:

1. The infrastructure on Vermont and Hillhurst above Sunset does not allow for large buildings, and would instead result in deadspace and degradation of the neighborhood. If you view large apartment buildings on Los Feliz Blvd, you can see that there is considerable space around the buildings through parking lots, green space, sidewalks. Hillhurst and Vermont lacks this space. Thus, like the enormous building being built abutting Hillhurst and Hollywood Blvd right now, the building is directly in contact with the sidewalk. This leaves people on the sidewalk in darkness, making the street less safe, and it prevents natural cooling of the area.
2. Tall buildings obstruct breezeways and lead to increased temperatures because the heat reflects off them from the streets. Tall buildings are directly linked to climate change. I am concerned that the EIR has not accounted for this. This should be a concern for Councilmember Raman, in making her recommendations for larger, dense, taller housing, as such buildings will contribute to rising temperatures which she cites on her campaign website to be of concern to her.

Graphical abstract



"What happens is that the little light that does reach deep inside these urban canyons gets reflected back up at the (often very reflective) walls of the buildings themselves. These buildings absorb the heat and then release it back into the surrounding area, causing the areas between tall buildings to retain more heat. This is easily confirmed by touching a tall building at night—it says warm well after sunset."

In addition, large buildings will require removal of greenery, including important trees which cool our climate. As well, the large shadows that will be splayed onto other buildings will kill any other greenery in their vicinity. According to the EPA city centers can be on average 6 degrees F hotter than the surrounding suburbs. Downtown Los Angeles has worse air pollution due to its tall buildings and narrow streets.

The city is facing a climate crisis and increased temperatures, it should be against any tall buildings that can increase the city's temperatures. The buildings will also eliminate green space, which affords the only cooling mechanism in the city.

Sources:

<https://www.sciencedirect.com/science/article/pii/S0269749117319322>

<https://gizmodo.com/why-tall-buildings-make-cities-hotter-1588242736>



Hollywood Community Plan

1 message

arun baheti <arun@baheti.net>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 9:37 AM

I write to express my concerns about the Hollywood Community Plan which has been endorsed by the councilperson for CD4. Based on recent history in our neighborhood, I don't feel there was enough community input or outreach regarding the lifting of height restrictions on Hillhurst (and possibly Vermont).

I generally support density and height as a way to increase housing and acknowledge the reality that LA is a city not a suburb. However, the walkability and local/small business orientation of the Los Feliz Village "shopping" blocks may be at risk with the currently endorsed plan.

Easing the height restrictions on Hillhurst may make sense (and I certainly don't support reducing existing height limits), but her stated position does not represent the views of my neighbors or me, and the plan as currently stated will do very little to actually create more affordable housing. I would prefer changes to zoning for multi-unit housing, in particular.

I hope the commission will engage in the community outreach needed to get input from those of us impacted by the proposed, poorly defined changes.

Thanks.

Arun Baheti
[4230 Hazel Kirk Drive 90027](mailto:arun@baheti.net)



Hollywood Community Plan Comments, Los Angeles Conservancy

Adrian Fine <afine@laconservancy.org>
To: "cpc@lacity.org" <cpc@lacity.org>

Tue, Mar 16, 2021 at 2:40 PM

To the attention of the members of the City Planning Commission:

On behalf of the Conservancy, please find the following comments and specific recommendations directed toward preservation, equity, affordable housing, and implementation purposes:

1. **Expand the definition of eligible historic resources within the plan and Community Plan Implementation Overlay (CPIO) as a mitigating measure**, to include those of local significance and classified as 5S3, to be consistent with the City's surveys and previously adopted community plans, such as South Los Angeles.
2. **Specifically identify and extend preservation and housing protections to Hollywood's historic bungalow courts** and their affordable Rent Stabilized Ordinance (RSO) units as a policy in the plan.
3. Commit to include in the plan and **adopt detailed operating procedures for the proposed Transfer of Development Rights (TDR)** program; and
4. **Expand the CPIO boundaries to East Hollywood** and tools as part of the Vermont - Western TOD Station Neighborhood Area Plan (SNAP) Specific Plan update and commit to doing so within one year.

We welcome an opportunity to discuss these recommendations further and request the City Planning Commission address these in detail at the upcoming meeting on March 18.

Thank you and best.

Adrian Scott Fine

Senior Director of Advocacy

Los Angeles Conservancy

523 West Sixth Street, Suite 826

Los Angeles, CA 90014

(213) 430-4203 | afine@laconservancy.org

-

Pronouns: He / His / Him / Mr.

Support community efforts to designate and protect Hollywood's Sister Mary Corita Studio as a Historic-Cultural Monument (HCM)!
<http://laconservancy.org/issues/sister-mary-corita-studio>

laconservancy.org

3/17/2021

City of Los Angeles Mail - Hollywood Community Plan Comments, Los Angeles Conservancy

[E-News](#) – [Facebook](#) – [Twitter](#) – [Instagram](#)

Membership starts at just \$40

[Join the Conservancy today](#)



Support for increased height limits in the Hollywood community plan for Hillhurst ave

1 message

Andy May <andymay@yahoo.com>

Wed, Mar 17, 2021 at 9:35 AM

To: cpc@lacity.org, contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org, sophia.kim@lacity.org, linda.lou@lacity.org, quetzalli.enrique@lacity.org

I am writing to confirm my support for the changes in the Hollywood Community Plan allowing for higher building heights on Hillhurst ave in Los Feliz

As a Los Feliz stakeholder, I'm very happy that the proposed Hollywood Community Plan Update has undergone last-minute changes by City Council member, Nithya Raman And that she has requested changes that accurately represent the viewpoints of this resident and other like me who understand the need for more density and more housing in LA and Los Feliz.

Thank you Nithya for taking the bold steps necessary to ensure more housing is built in LA.

Andy May

1901 N New Hampshire ave

Los Angeles, CA 90027



DO NOT ELIMINATE Los Feliz Height Restrictions!

1 message

Andrea Newman <andreanewman@mac.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 5:03 PM

To our City Council —

As a longtime Los Feliz resident, I am appalled by Nithya Raman's attempt to go against the community's wishes and propose eliminating the height restrictions in Los Feliz village. Hillhurst and its surrounds are safe and walkable and not overrun by large corporate businesses and real estate companies, which is a rarity and makes the community so special. Eliminating height restrictions will turn Los Feliz village into Downtown Los Angeles, making it less safe and less welcoming to residents and visitors alike.

The idea that the elimination of height restrictions will help with housing the homeless is absurd and disingenuous, and DTLA is a perfect example. New high rises go up in downtown every day, and the downtown homeless population has exponentially increased at the same time. Huge buildings make for anonymity, and big money for big corporations. Los Feliz is a jewel in Los Angeles — a walkable, unique, neighborhood community. Don't turn it into an unsafe, over-congested and corporate-centric neighborhood, thereby pushing the people who truly care about it out.

Thank you for listening to the residents who will be affected the most.

Best,

Andrea Newman
Los Feliz



Planning CPC <cpc@lacity.org>

Hollywood Community Plan Update

1 message

Andrea Iaderosa <playwrightssouth@gmail.com>

Wed, Mar 17, 2021 at 4:23 PM

To: cpc@lacity.org, contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org, sophia.kim@lacity.org, linda.lou@lacity.org, quetzalli.enrique@lacity.org

Good afternoon everyone,

I am a long-time Los Feliz resident (Kingswell Avenue), and I am against lifting the height restrictions on Hillhurst Avenue - or anywhere else in Los Feliz. Lifting height restrictions will ultimately have a negative impact on the quality of life in the neighborhood for a whole host of reasons. Please consult with the neighborhood residents before deciding to make drastic changes. Shame on you.

Sincerely,

Andrea Rose
323-666-3950



Planning CPC <cpc@lacity.org>

I oppose the Hollywood Community Plan Update/ This is a very unfair decision

1 message

Alix Soubiran <alix@princesandcrows.com>
Bcc: cpc@lacity.org

Wed, Mar 17, 2021 at 9:27 PM

Hello,

This sudden decision feels like a betrayal. As a Los Feliz stakeholder, I'm concerned the proposed Hollywood Community Plan Update has undergone last-minute changes that have not been properly or adequately reviewed by the community at large. City Councilmember, Nithya Raman, has requested changes that have had little or no community input, nor accurately represent the viewpoints of the residents she purportedly represents. If the plan is to be modified from the previous versions that did receive input, then the community should be allowed to make their thoughts known before any final approval is given.

This feels very unfair and I hope you consider my opposition seriously.

Sincerely,

Alix Soubiran
[1534 sanborn ave](#)
[Los Angeles](#)
CA 90027

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Alix Soubiran
President
Los Angeles, CA
+1 213.271.5609
alix-soubiran.com



ALIX SOUBIRAN
ARTIST & CERAMICIST





March 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.

[Our previous letter to the City Planning Commission](#) expressed our concern that the proposed Hollywood Community Plan does not come close to accommodating the Hollywood area's massive need for housing, and identified five opportunities to improve the Plan. We appreciate your openness to our concerns, particularly around the proposed height limits that would be imposed on Hillhurst Avenue and Sunset Boulevard under the current version of the Plan.

We wish to recognize the Just Hollywood Coalition's longtime advocacy for stronger affordable housing provisions in the Hollywood Community Plan update. We agree with the Just Hollywood Coalition that the current version of the Plan does too little to encourage affordable housing growth, and that it fails to address the troubling trend of rent-stabilized housing units in Hollywood being demolished and replaced with hotels. Additionally, we are concerned that elements of the Plan may even undermine the successful Transit-Oriented Communities incentive program.

For these reasons, we ask the City Planning Commission to endorse the following amendments to the Hollywood Community Plan:

1. On Regional Center 1A, Regional Center 1B, and Regional Center 2 parcels, allow all-residential projects or residential projects with ground-floor commercial space to be built to a maximum bonus FAR to 9:1.

The proposed Plan would set the maximum bonus FAR to 6.5:1 (in RC1B), 4.5:1 (in RC1A) and 3:1 (in RC2). These maximum bonus FARs are unduly low and severely limit the potential for new affordable housing production near Metro stations.

Setting the maximum bonus FAR to 9:1 would be in keeping with the current zoning of high-density commercially-zoned parcels near Metro in Los Angeles. Today, most of the parcels in RC1A, RC1B, and RC2 are zoned C4-2D and are eligible for TOC Tier 3 incentives. If not for the D condition constraining maximum FARs on these parcels under current zoning, these parcels could be built to a 9:1 FAR in return for meeting the TOC affordable units set-aside. This is because C4-2 parcels may be built to a maximum 6:1 FAR, and are eligible for a 50% FAR bonus under TOC. Thus, allowing a maximum bonus FAR of 9:1 on these parcels would simply remove the harmful impact of the D condition.

Setting the maximum bonus FAR to 9:1 would increase the number of deed-restricted affordable units that would be built on RC1A, RC1B, and RC2 parcels. This is because the CPIO affordable set-aside is defined as a percentage of **total** units; so increasing the maximum bonus FAR increases the number of affordable units in a project. The City should jump at the chance to encourage high-density, mixed-income housing near Metro in a major job center.

2. Introduce a parking maximum and a per-space fee on parking facilities within a half-mile radius of the Highland, Vine, and Western Metro stations.

We are pleased that the CPIO would eliminate mandatory on-site parking requirements in the Regional Center area of Hollywood. 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.

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.

3. In the Multifamily Residential, Corridors, and Character Residential subareas, ensure that CPIO incentives (e.g. maximum bonus FAR, building height, parking reductions) are equivalent to or better than the Transit-Oriented Communities incentives.

In the Multifamily Residential, Corridors, and Character Residential subareas, the proposed CPIO incentives are less advantageous than those provided in TOC. For example:

- 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.

To offer one specific example: today, parcels on Melrose Avenue just east of Fairfax Avenue are zoned C4-1XL and are eligible for TOC Tier 3 incentives. Projects that meet the TOC affordable unit set-aside may be built to a maximum FAR of 3.75 and a maximum height of 52 feet. Under the CPIO, projects that meet the affordable unit set-aside could only be to a maximum FAR of 2 and maximum height of 30 feet. This ill-advised decrease in the maximum bonus FAR would deter redevelopment and discourage the production of affordable units.

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 Multifamily Residential, Corridors, and Character Residential subareas so that residential density bonuses, FAR bonuses, and maximum building heights are equivalent to or more generous than the TOC program's parameters.

4. Legalize mass timber construction in downtown Hollywood, where it's currently banned.

Much of downtown Hollywood falls into Fire District 1, where type IV (heavy timber) and V (wood-frame) construction are banned. However, new type IV and type V structures, including multi-family residential buildings, are fire-safe under current building codes. Wood-frame buildings are also less expensive to build than steel or concrete buildings, reducing the cost of housing production.

Mass timber construction is a promising new building technology that has been embraced in Europe, Canada, Oregon, and Washington. In January 2019, the International Code Council (ICC) authorized adding three new type IV construction types, allowing taller buildings using mass timber with additional fire protections. Mass timber offers a solution to climate change because wood from properly managed forests absorbs carbon dioxide, while production of concrete is responsible for 8% of global greenhouse emissions. Additionally, according to Henry Fung, PE, "Tall mass timber building construction has been reviewed by engineering experts worldwide and found to be as safe as existing construction. We should encourage innovative ways of building new housing because the need is just too great."

Los Angeles should not preemptively ban a new construction method that could help meet our city's housing needs and its climate change goals, and should not raise building costs unnecessarily. We recommend amending Fire District 1 to legalize mass timber construction everywhere in Los Angeles, including Hollywood.

A Hollywood Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. It's not too late to get this Plan right.

Thank you for your consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Anthony Dedousis
Director of Policy and Research
Abundant Housing LA



Planning CPC <cpc@lacity.org>

Don't ruin Los Feliz. It's not Hollywood

1 message

Baxley Andresen <baxleyandresen@gmail.com>

Wed, Mar 17, 2021 at 9:10 PM

To: "cpc@lacity.org" <cpc@lacity.org>, "priya.mehendale@lacity.org" <priya.mehendale@lacity.org>

Hello,

Los Feliz is a neighborhood not made for high-rises. The main reason people love it is because of the way it is. Also, it is a congested distance already from freeways. The traffic is bad enough already, and as a person who grew up in Los Feliz to the 80s and 90s, I'd hate to see it lose its originality, flare and the actual topography and community that make it special. All of this planning goes against the actual desires of the residences. This is not just a suggestion of a way to help homelessness, this is a booster for greedy developers who value profit over person.

And you don't live in this neighborhood. No one wants this. Do not allow Ms Raman's plan to move forward as is.

Baxley



Planning CPC <cpc@lacity.org>

Objection To Changing Height Restrictions

1 message

bruceharing0@gmail.com <bruceharing0@gmail.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 3:44 PM

Hello:

I am a 30-year resident of Los Feliz and would like to add my voice to those who oppose eliminating the height restrictions on Hillhurst Avenue and Vermont Avenue in the Los Feliz Village.

Los Feliz is a special part of Los Angeles, and allowing hi-rise development would be a crucial mistake in ruining what makes this area special.

Please do NOT pass this into law. It is a bad policy.

Sincerely,
Bruce Haring
[3662 Lowry Road](#)
323-868-5928



Hillhurst Avenue height restriction

1 message

Bill Stephens <bill@billstephens.net>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 8:18 PM

March 17, 2021

I oppose eliminating the current height restrictions on Hillhurst Avenue in Los Feliz.

Please see:

"The Architectural Guidebook to Los Angeles"
by Gebhard and Winter (6th Edition)
p.198

"...the commercial corridors of Los Feliz Village along Hillhurst and Vermont Avenues compose an arrangement of exceptional pedestrian urbanism. Here, an assortment of multiple dwellings and bungalows surround two cozy commercial strips of attractive street fronts."

Best,
Bill Stephens
long-time Los Feliz resident



No high-rises on Hillhurst

1 message

Carolyn Corrie <cjcorrie@yahoo.com>

Wed, Mar 17, 2021 at 4:32 PM

To: nithya.raman@lacity.org, sarah.tanberg@lacity.org, cpc@lacity.org

Cc: quetzalli.enrique@lacity.org, linda.lou@lacity.org, sophia.kim@lacity.org, priya.mehendale@lacity.org

Dear Policy-Makers,

My husband, daughter and I have loved calling Los Feliz our home for more than 20 years. Our daughter has attended all the local schools (Franklin, King, Marshall). We love the small town within a big city vibe of our neighborhood, and so we are very concerned about the plan to put high-rises right in the middle.

Perhaps most importantly, I'm concerned about the lack of community input. Please listen to our voices. NO EXPENSIVE HIGH RISES. Please develop other means for supporting housing that meets the needs of multiple income groups.

Thank you,
Carolyn Corrie



A More Effective Hollywood Plan

Chris Dower <chrisdower01@everyactioncustom.com>

Wed, Mar 17, 2021 at 11:39 PM

Reply-To: chrisdower01@gmail.com

To: cpc@lacity.org

Dear City Planning Commission,

I'm writing to offer comment on the proposed update to the Hollywood Community Plan. I'm deeply concerned about our region's affordable housing shortage and its impact on the future of Los Angeles, and disappointed that our city isn't doing enough to encourage strong housing growth at all levels of income.

As you know, Los Angeles is suffering from a severe housing crisis. Longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets, leading to 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.

Building a more equitable and prosperous future requires us to create hundreds of thousands of new homes throughout Los Angeles, especially in job-rich, transit-rich, and high-opportunity areas. While the Hollywood Community Plan update should be a golden opportunity to encourage strong housing growth near Metro and job centers, the current Plan fails to accommodate Hollywood's massive need for housing, and doesn't do enough to encourage affordable housing production. It also fails to address the troubling trend of rent-stabilized housing units in Hollywood being demolished and replaced with hotels.

We can't afford to tinker around the margins: we need a transformative Hollywood Community Plan.

For these reasons, I urge you to incorporate the following amendments to the Plan:

On RC1A, RC1B, and RC2 parcels, allow all-residential projects or residential projects with ground-floor commercial space to be built to a maximum bonus FAR to 9:1. This will ensure that parcels next to Metro stations can accommodate high-density housing containing a significant share of affordable units.

Introduce a parking maximum and a per-space fee on parking facilities within a half-mile radius of the Highland, Vine, and Western Metro stations.

In the Multifamily Residential, Corridors, and Character Residential subareas, ensure that CPIO incentives (e.g. maximum bonus FAR, building height, parking reductions) are equivalent to or better than the Transit-Oriented Communities incentives.

Legalize mass timber construction in downtown Hollywood, where it's currently banned.

A Hollywood Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. It's not too late to get this Plan right.

Personally sent by Chris Dower using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Chris Dower

333 S Doheny Dr Apt 202 Los Angeles, CA 90048-3770



1) We need more homeless housing options in the community. Any open city-owned lots or unused structures on city-owned property needs to be designated for homeless shelters. 2) Any proposed projects that will be developed on a site where tenants currently live needs to require a right of return for the tenants into a newly constructed unit. The developers must also pay the difference in rent during the time of construction to make sure that tenants don't become homeless while the construction is happening. 3) There must be a requirement for very low-income and extremely low-income housing to be built in the area. We don't need to incentivize it, we need to demand it. We need at least 35% of all new developments to provide housing at the lowest end of the income spectrum. 4) We need more protections for our older structures. We need to preserve our history, which is the reason why people want to live in Hollywood. Thank you: Charles Tait (661) 481-5475

1 message

Charles Tait <charles.tait@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 6:31 PM

March 17, 2021

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

Dear Ms. Millman,

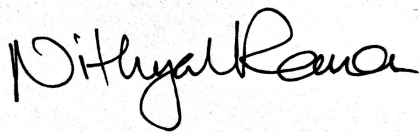
As the Hollywood Community Plan returns to the City Planning Commission this Thursday, our office would like to take this opportunity to commend the extraordinarily high level of engagement for more than a decade from countless residents and community groups, nearly all of whom are seeking the same thing: a thriving, diverse, and affordable Hollywood.

The plan, as drafted, is a reflection of the diligence, hard work, and collaboration of the neighborhood's many stakeholders and the city's Planning staff, and it goes a long way towards realizing that vision of Hollywood we all share.

Our feedback to the process so far comes from our values around protecting existing tenants and small businesses from displacement, building more affordable housing at appropriate scales along major transit corridors, and preserving open space in the Santa Monica Mountains -- and we are excited to continue hearing feedback from all stakeholders and sharing them with the Planning Department.

The Hollywood Community Plan Update is in a dynamic and deliberative process. We look forward to continuing our due diligence as this plan makes its way to City Council. We will continue to work with Hollywood's diverse constituencies to arrive at an outcome that meets its many and varied needs -- both today and for decades to come.

Thank you again for all of your work and engagement on the Hollywood Community Plan Update process.



Los Angeles City Councilmember Nithya Raman, 4th District

Craig Lawson & Co., LLC

Land Use Consultants

March 17, 2021

Ms. Samantha Millman, President
City Planning Commission
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Sent via e-mail to: cpc@lacity.org

**RE: Case No. CPC-2016-1450-CPU (Item 6 on the March 18, 2021 CPC Agenda)
Hollywood Community Plan Update – Hollywood Media District – Subarea 40:2**

Dear President Millman and Members of the City Planning Commission,

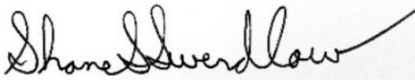
On behalf of Avon Studio transportation (“Avon”), the owner of the property at 936-962 N. Seward Street and 949-959 N. Hudson Avenue within Subarea 40:2 of the Hollywood Media District, we would like to thank you for this opportunity to comment on the Hollywood Community Plan Update. Avon has previously expressed support for the City’s proposal to allow 3:1 FAR in Hollywood Media District projects that include at least 0.7:1 FAR of media-related uses.

However, Avon has concerns about the proposed prohibition of residential uses in Subarea 40:2. **We, therefore, request that the proposed “Q” Conditions in Subarea 40:2 be modified to allow multi-family residential units on a campus of entertainment production uses** for the following reasons:

- Subarea 40:2 currently contains, and is adjacent to, residential zones and uses, in addition to industrial, media, and commercial uses, all of which co-exist harmoniously.
- There is strong demand for residential units near media uses. This demand is driven by locally-based employees, as well as visiting talent (for whom on-site units provide an attractive, secure, and convenient alternative to off-site lodging).
- Allowing residential development on campuses of entertainment production uses will help address the critical housing shortage in our region, while ensuring the entertainment industry remains the core focus for this part of Hollywood.
- Nearby Subareas (including Subarea 17:3) are proposed to allow dwelling units in developments with media-related uses. This right should consistently be provided throughout more of the Media District, including Subarea 40:2.
- There is broad support among property owners to allow residential uses in Subarea 40:2.

Thank you for your consideration of this request.

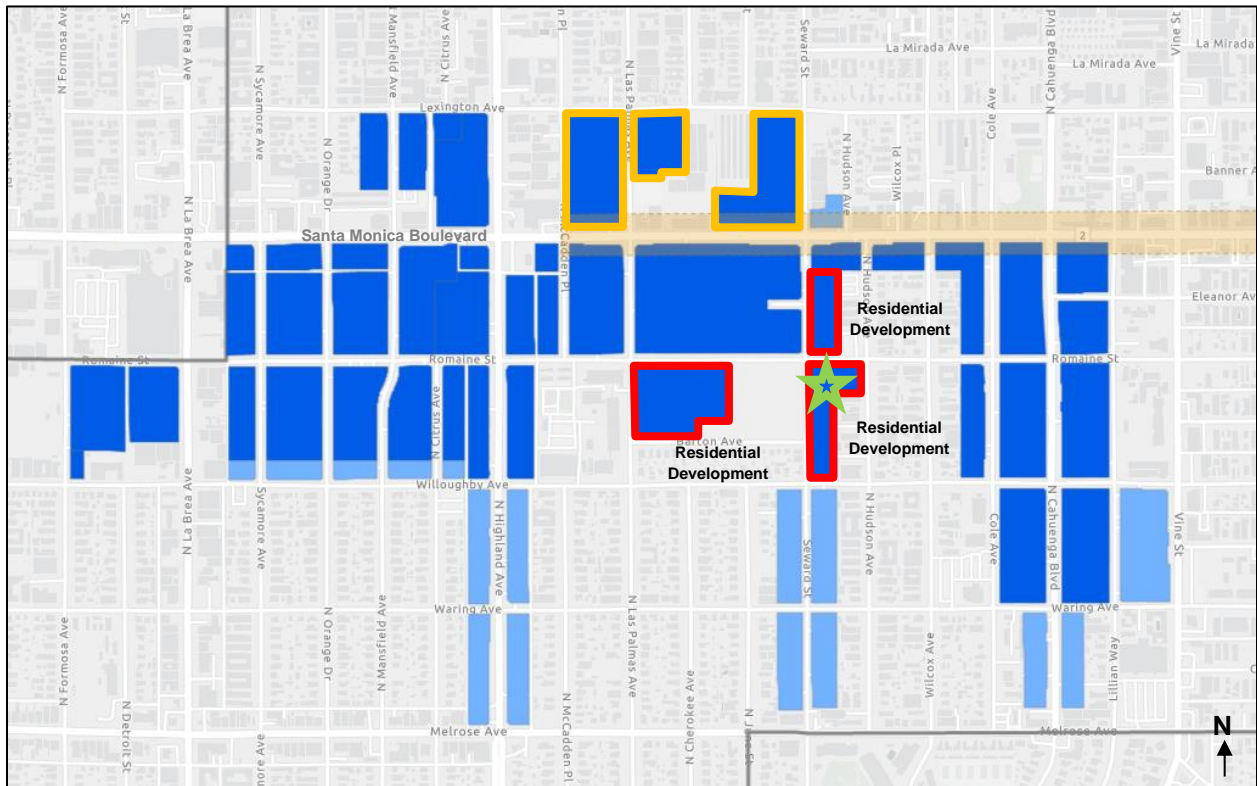
Sincerely,



Shane Stuart Swerdlow
Senior Project Manager, Craig Lawson & Co., LLC

CC: Ms. Linda Lou, City Planner (Via E-mail), linda.lou@lacity.org
Mr. Craig Bullock, CD 13 Planning Director (Via E-mail), craig.bullock@lacity.org

Hollywood Media District Expansion Area (Shown in Blue)



Legend

Note: Base Map is from Department of City Planning's Hollywood Community Plan Update website. Dark blue shading on this Base Map corresponds with "Media Use Expansion," light blue shading corresponds with "Media Use Preservation," and gold shading corresponds with "Theatre Row."



Green star identifies property owned by Avon Studio transportation



Red outlines identify Subarea 40:2, where residential uses are requested in projects integrating targeted media-related uses, but are currently proposed to be prohibited



Orange outlines identify Subarea 17:3, where residential uses are proposed to be allowed in projects integrating targeted media-related uses



Housing Justice is Climate Justice (Hollywood Community Plan, Item #6) / CPC-2016-1450-CPU

1 message

Damaris Chacon <info@sg.actionnetwork.org>

Wed, Mar 17, 2021 at 10:32 AM

Reply-To: damadancer@yahoo.com

To: cpc@lacity.org, councilmember.ofarrell@lacity.org, contactCD4@lacity.org, paul.koretz@lacity.org, daniel.skolnick@lacity.org, craig.bullock@lacity.org, meg.healy@lacity.org

Honorable Members of the Planning Commission,

Housing Justice is Climate Justice and Hollywood is one of the most impacted places in our City by gentrification. I urge the City Planning Commission to support a Just Hollywood.

Don't undermine our affordable housing programs by giving developers the right to build larger buildings, twice the size (with an increase to 4.5 FAR) in some cases of what it is allowed currently, without requiring affordable housing. If all we build near transit in Hollywood is luxury hotels, office buildings and market rate apartments we will continue chasing out Hollywood's essential workers, the core transit riders of our City. I also want to thank Councilmember Raman and Koretz for listening to our concerns, and building upon rather than undermining affordable housing in their districts. The same must be done for some of the most desirable and most transit rich locations in the City- in Central Hollywood. I call on Councilmember O'Farrell, Chair of Energy, Climate Change, Environmental Justice and River Committee and City Planning Commission to be leaders on environmental justice and support the Just Hollywood Plan. Thank you.

Damaris Chacon

damadancer@yahoo.com

8538 Cherokee Dr.

[Downey, California 90241](#)



Hollywood Community Plan Update -

D Chew <dchew1209@gmail.com>
To: cpc@lacity.org

Tue, Mar 16, 2021 at 1:20 PM

TO: Los Angeles City Planning Commission

From: Dennis Chew

Dear Planning Commissioners,

I am writing to you in support of the Hollywood Community Plan Update of that portion which is addressed as Subarea 13.1, 13, 12, 12.3, 12.3A, and 97 as written by the Planning Department.

I am responding to the Commission Meeting of February 18th, being critical with the views of some Commissioners which voiced an opinion to not recognizing the usefulness of the proposed and existing height limits in certain areas of Los Feliz. I would like to point out that this Proposed Community Plan is replacing the Plan which was in place from 1988 only because the Community Plan Updates which followed were considered and were discarded. And yet within those Plans, none of the areas considered as “around Los Feliz” were viewed for consideration. Past Planners viewed certain areas as sacrosanct to Los Angeles.

Los Feliz, Larchmont, Leimert Park, etc. have an identity that some are unwilling to change. Many hundreds of people have staked their whole lives into these neighborhoods for their value, their quaintness, their “liveability”, to this idea of a “village”. The areas which have been designated by City Planners of the past as higher density or Regional centers were “planned” as such having those communities willing to support those ideas and ideals. Those smaller communities were given a role of being “livable”. Having every place being like everywhere else may not be a goal to achieve. Having a City with scattered areas which are pockets of walkable and human scaled villages maintains its viability.

I thank you for your time and attention.

Dennis Chew



Planning CPC <cpc@lacity.org>

Please vote for the Hollywood Plan

1 message

Dana Ross <danarossphoto@yahoo.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 5:35 AM

Item No. 6, CPC-2016-1450-CPU.

Please vote for the up-dated Hollywood Plan and expand the definition of Middle Income Housing.

This is vitally important to help end the Homeless crisis.

I hope this passes.

Danaross.com

323-472-5624



Informing residents and visitors about the unique culture and lore of Hollywood since 1986

SENT VIA EMAIL

March 11, 2021

Los Angeles Planning Commission
201 North Figueroa Street
Los Angeles, CA 90012

Re: Comment on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Honorable Commissioners:

Please accept the following letter as additional public comment on the draft Hollywood Community Plan Update being considered March 18, 2021. I have been continually active in the communities of Hollywood and Los Feliz for over 40 years serving both as editor of this publication and as president of the Hollywood Arts Council for 33 years. I was on the CRA’s Project Area Committee and was the founding chair of the Hollywood Chamber of Commerce Tourism Committee. I also served six years on the Los Feliz NC and was president of the Los Feliz Improvement Association.

We’ve waited years for this long overdue Plan. I’ve participated in the many meetings providing input as a concerned and involved citizen. My main concern rests with the protection of this area as one of Los Angeles’ most valuable resources. I was encouraged that while espousing historic preservation as one of its key goals, the Plan falls short adding provisions, including a proposed ordinance, that could undermine saving Hollywood’s historic built environment.

Hollywood celebrated 100 years in 1987, many of its early buildings built during the phenomenal growth of the film industry from the silent era to its Golden Age remain. Much of this gives our community its character and allure. Until the last 20 years and its current “renaissance,” its vast potential was unrealized. That has changed and a plan to help preserve, protect and maximize its benefit to the entire city is important.

Although thousands of new apartments have been built or are in the pipeline, the quest for more housing threatens Hollywood’s traditional affordable housing stock that exists in older multi-family buildings throughout the area. These structures are important not only to providing affordability but to preserve its authenticity and sense of place.

Further, little is to be gained by lifting height limits in either Hollywood’s central National Register designated core or in nearby village communities specifically in Los Feliz on Hillhurst and Vermont Avenues. This impacts the quality of life for all residents no matter their economic background.

There are many areas within a few miles of Hollywood that could withstand an increased FAR without killing the goose that lays the golden egg. Eradicating character, charm and history replacing those important and enviable qualities with high soulless glass or stucco boxes is not the answer and not good planning. There is no doubt that Hollywood’s future is in your hands.

Sincerely,

Nyla Arslanian
Editor

CC:
Councilmember Mitch O’Farrell
Councilmember Nithya Raman
Ken Bernstein, Dept. of Planning
Craig Bullock, CD13
Meg Healy, CD4



Hollywood Art Center, est.1912
1926 N. Kenmore Ave#107
Los Angeles, CA 90027

SENT VIA EMAIL

Los Angeles Planing Commission
200 N. Spring Street
Los Angeles, CA 90012

March 17, 2021

RE: Response to February 18, 2021 City Planning Commission Hollywood Community Plan Update meeting.

Dear Members of the City Planning Commission,

As a stakeholder in Hollywood and Los Feliz, and the the *Director* of the Hollywood Art Center HCM#1202, and a current *Research Archivist* at UCSB's Art, Design and Architecture Museum, as well as a lifetime Hollywood Champion, I'm asking you to:

1. Please correct and adjust the current up-zoning laid out in the proposed Hollywood Plan and afford Hollywood the protections of any HPOZ.
2. Approve and recommend the adoption of the height restrictions on Hillhurst Avenue in Los Feliz, as submitted in the Draft Hollywood Community Plan Update. Los Feliz has been an HPOZ candidate for at least the last ten years. Los Feliz deserves the same protection that an HPOZ affords. And the Hollywood Plan is not a one size, fits all plan, when neighborhoods like Los Feliz should be considered differently, than other parts of the plan.

REGARDING COUNCILMEMBER NITHYA RAMAN FEBRUARY 17, 2021 STATEMENT: Many members of the Hollywood and Los Feliz communities, are extremely dismayed at CD4 Councilmember Nithya Raman's request, as Los Feliz Improvement Association (LFIA) says for the *elimination of the height restrictions in her February 17, 2021, letter to the City Planning Commission. Considerable effort was put into formulating a plan for Hillhurst that was right for the neighborhood, and our newly elected Councilmember took it upon herself to request this change without any input from the community.* The lack of consideration and due process to unilaterally decide this, without ANY community input is a shameful act and has broken the trust of the people she represents. Since all of you work as public servants, you know that community process is key in creating successful outcomes. Literally, it's all about the process. And the current Hollywood Community Plan is flawed with up-zoning problems and lack of protections for our historic resources. And again, instead of working with the community, councilmember Nithya Raman, carelessly decided to promote the destruction of Los Feliz especially, as of one of the most incredible, last walking neighborhoods of important historical, architectural and cultural significance in Los Angeles. Further, councilmember Nithya Raman's statement does not reflect the feelings and views of the community she actually represents.

In addition, LFNC has also not sought any real community input regarding these upzoning issues from the Los Feliz Community, which does not support Nithya's statement either. I mention this in case LFNC decides to submit a statement in favor of councilmember Nithya Raman's Feb. 17, 2021 statement. Or if LFNC remains silent, their

silence should not be considered as showing support for councilmember Raman's plans to irresponsibly up-zone Los Feliz.

However, I do fully endorse Los Feliz Improvement's Association stance, who truly knows and understands our community. Please see link or click on attached document. <https://www.lfia.org/lfia-response-to-planning-commission-re-hollywood-community-plan/>

Please change the current Hollywood Community Plan to help Hollywood and Los Feliz to grow and thrive while preserving and protecting the very culture character and community which makes it a place that is uniquely identified world wide. Please correct up-zoning in designated National and State historic districts and Historic Cultural Monuments. And irresponsibly limits proposed development review. And these areas deserve the same protections granted to HPOZs. Please do the following:

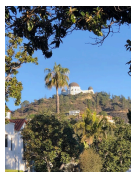
Preserve Historic Buildings and All Significant Cultural Sites. Protect Existing Affordable Housing and promote re-use. Celebrate Hollywood's Diverse Communities. Preserve the cultural landscape of Hollywood and Los Feliz. Protect the place where cultural producers live that is inextricably tied to our creative economy and film industry. Preserve the very culture, character and community which makes it inspiring for all who live here.

Thank you for your time and review of this important matter. Again, please do not approve the current Hollywood Plan as it is right now. Ensuring our cultural resources, residential neighborhoods are protected, is essential to the local, state, national and international cultural community needs to be prioritized. We need to preserve it for its past, for its present and future generations that create iconic works of art, film, architecture within this unique and fascinating urban landscape.

Please let me know, I'm happy to speak more regarding any of these points. And as always, I'm open to engaged discussions that serve the community in a sensitive and productive way.

Sincerely,

Elizabeth A. Lovins
Director, Hollywood Art Center, est. 1912
Research Archivist, UCSB Art, Design, and Architecture Museum
Los Feliz Resident, since 2003
Lovins family Hollywood resident, since 1910



CC:
Councilmember Mitch O'Farrell
Councilmember Nithya Raman
Ken Bernstein, Dept. of Planning
Craig Bullock, CD13
Meg Healy, CD4

**EAST HOLLYWOOD
NEIGHBORHOOD COUNCIL**

GOVERNING BOARD OFFICERS

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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



Epicenter Landcorp LLC - 1027 Lillian Way - Hollywood Community Plan Update

vasco@quixote.com <vasco@quixote.com>

Thu, Mar 18, 2021 at 6:51 AM

To: Planning CPC <cpc@lacity.org>

Cc: Linda Lou <linda.lou@lacity.org>, Quetzalli Enrique <quetzalli.enrique@lacity.org>, hollywoodplan@lacity.org

Dear Cecilia,

Kindly see below my submission, now in compliance with Rules & Operating (only 248 words, which is less than 1 page).

Thank you, Vasco

Dear Ms. Lou,

I represent Epicenter Landcorp, an affiliate of Los Angeles-based Quixote Studios. Quixote has been a vital contributor to content production in the City for the past 25 years. We own property throughout LA and through Sheppard Mullin submitted a letter on December 16, 2020 related to the property bounded by Eleanor, Lillian, Romaine, and Cahuenga, in the middle of the Hollywood Media District (the letter is attached again for your convenience). At this location, Quixote employs close to 60 employees and has occupied the property for almost 20 years.

We requested the City increase the FAR from 3:1 to 4.5:1 with the provision of additional FAR related to targeted media-related uses. We also requested the City remove conditions that limit the size of retail and restaurant uses. These requests were not incorporated into the Plan. As I mentioned during the public hearing on February 18, 2021, we encourage the Commission to reconsider. To expand existing media-related uses and provide more jobs in this area, the City must permit a greater FAR to ensure marketability and attract more users to the Site. This request is consistent with recent developments off Cahuenga Boulevard in the vicinity of the Site, including Sunset Gower Studios. Without incorporating the requested changes, the City could lose a key media-focused parcel that could be further activated.

Epicenter and Quixote are committed to the further development of media and entertainment uses in Hollywood. We thank you, the staff and the Commission for their time and consideration.

Vasco Noya di Lannoy



VASCO NOYA di LANNOY

Chief Investment Officer

Epicenter Landcorp, LLC

1011 N Fuller Ave, West Hollywood, CA 90046

Tel: +1 310 989 7913

[Quoted text hidden]



Upcoming in los Feliz

1 message

Faith Crawford <faithcrawford@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 11:29 AM

To whom it may concern,

I am a property owner in los Feliz and I am against doing away with all height restrictions in certain areas. While I understand the need for housing in Los Angeles, I am against skyscrapers on Los Feliz Blvd. The traffic would go insane and my property value would suffer. I've worked hard for my house and the thought of losing value because I lost my view is really upsetting. I know it's not the worst problem in the world but buying a house is part of a persons financial plan. i'm not one of the insane wealthy people who can just easily move eat a loss of value. I'm OK with a slight raise but to turn it in the Wilshire Boulevard is a frightening prospect. I just wanted my voice to be heard in this matter. I think this new plan is too extreme.

Thank you
Faith crawford



Planning CPC <cpc@lacity.org>

Outraged!

1 message

Gordana Golubovic <g@gordanag.net>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 8:07 AM

Hi,

I have lived in Los Feliz in 4 different homes for the last 20 years and am outraged to hear that Nithya Ramen, who I voted for, is planning on passing the Hollywood community plan. Friends that visit from all around the world comment on quaint and beautiful this neighborhood is. To change the architecture of it, this drastically would take away the charm. Especially without community input. I would hope you would reconsider such drastic measures to this very special place in Los Angeles.

It's absolutely disgusting to think that this is in the plans. To even consider this you have no clue on what this neighborhood is about. Just as greedy as the developers that are ruining the rest of Los Angeles. So sad...

Gordana Golubovic
323-605-4034



Complaint about lifting height requirements on hillhurst

1 message

Gerald Lee <geraldjlee@gmail.com>
To: sarah.tanberg@lacity.org, cpc@lacity.org
Cc: nithya.raman@lacity.org

Wed, Mar 17, 2021 at 3:02 PM

I hear that height requirement on Hillhurst is being lifted. There has been no input by Nithya Raman from the community forum to discuss this. We are interested in preserving Los Feliz as is and not interested in building bigger buildings as there are already enough rental units going up on western and sunset blvd 735 units and also many residential use units complex on Hollywood and Hillhurst. Of note this does not preserve any property values in Los Feliz by creating more traffic, congestion, noise, and unruly people as if there aren't enough already. Nithya did you sell out to the developers like Jose Huizar? Speaking of unruly people there has been no effort by council district 4 to address immediate concerns about parking cost increases at the observatory, ongoing destruction and vandalism by Graffiti in the Los Feliz area, lack of police presence in Los Feliz against gangs in the area, and all you care about is building more building attracting worse people to this area? I have not seen any effort by your office to address rampant crime and Graffiti with tons of work requests placed to eliminate Graffiti to make Los Feliz a safer place. You are out of touch with core issues and the Los Feliz community at large and more interested in helping big business ruin small business in Los Feliz and drive out residents who enjoy the area. No we don't support passing higher fees on parking in the observatory area. It is more expensive per hour than parking a whole day at Disneyland. Mr Griffith wanted the land for the enjoyment of the people and made it free for all to use not turn it into the city's hefty revenue gouging war against people's right to enjoy what Mr Griffith bequeathed the park for. You can share these thoughts with Garcetti.

Sent from my iPhone



Planning CPC <cpc@lacity.org>

Los Feliz changes in zoning laws

1 message

Garland Schweickhardt <gschweickh@sbcglobal.net>

Wed, Mar 17, 2021 at 11:11 AM

To: CPC@lacity.org, CD4@lacity.org, Nitty.raman@lacity.org, Sarah.tanberg@lacity.org

It has come to my attention that the City Planning Commission is considering changes in height restrictions for both residential and commercial buildings in the Los Feliz area. These changes are being considered without any input from the community at large. Los Feliz does not need height restrictions changed and does not need more buildings such as the ones being built at Edgemont and Hollywood Blvd and at Hillhurst and Hollywood Blvd. Nitthya Raman is not representing the residents of Los Feliz with her advocacy of change in height restrictions.

Sincerely,
Garland Schweickhardt
1921 N Edgemont St
LA CA

HERITAGE PROPERTIES

The CPIO lands bonuses smack on the area with the most restored theaters in the nation and smack on top of 913 or more existing designated landmarks in or adjacent to the tourist, tech, and entertainment commercial center, incentivizing FARs of over 4.5:1 – 6.5:1 –highrise construction in a specialty main street area.

6. **Do not agree that significant adverse effects on historic resources are “unavoidable”. They are avoidable. 7,000 of 9,000 units for 2040 already entitled and/or built in central Hollywood since the 2016 EIR:** The 2016 EIR projected 9,000 units needed, of which 7,000 have been built or entitled since 2016. Thus for growth per EIR, the Plan must provide for 2,000 more units.
7. **Upzoning unneeded when zoning in 1988 Plan was ample for all expected housing growth. Density bonuses don’t work when RHNA numbers mean future buildings must be 80% affordable.** HPCU area has existing high housing capacity, so the logic of bringing back the 2012 upzoning is unsupported. 21,000 units remain buildable in HPCU residential zones, and another 23,000 in commercial zones outside of the historic core CPIO area under the 1988 Plan (before TOCs). (Plus 1700 ADUs.) The RHNA goal for the last 7 years applied to Hollywood was 2,977 units. Next RHNA goal for 9 years is 7x that! 10,000 units plus 13,150 units affordable! 7,000 units are already entitled/ built, so **3,150 roughly can be built at market. The remaining 13,150 units (80%) must be affordable.** This is not achievable with density bonus. California Department of Finance figures 1,076 units are needed in Hollywood in **the next 9 years** due to growth. RHNA numbers are over **twice that per year.** If RHNA numbers have meaning and are to be followed density bonus cannot produce what is required.
8. **Vacancy report reveals vulnerability in counting on luxury housing to provide affordable.** UCLA found 8-15% vacancy rate in Hollywood (against a common 3.3%)— before COVID. If that's roughly 10,000 empty units in Hollywood, how well will a density bonus program fare? Upzoning is proven to escalate the cost of land –one of my Hollywood multifamily lots from 2003 to now increased in land value 17x over wage increases in the same 18 years. Zoning didn't change- but developers assume now they will also get the massive 2 – 5X density increases from existing zoning granted by the City-- with no required public benefits – fueling major land speculation.
9. **CPIO-goodbye prevailing wage rates and local hiring?** CPIO proposes replacing TOC Ordinance, so it also eliminates wage requirements for construction trades, yes?_ The “TOC” projects started as Measure JJJ, with subsequent large increases in bonuses added over what the voters approved. Unions supported the legislation. Is this correct?
10. **Judge Goodman rejected this same zoning plan in 2012, and it is more damaging now.** due to flawed demographics and zoning.. The fundamental Plan is unchanged, except that recently the CPIO was added offering density bonuses after upzoning, with no hearings, environmental review, or supporting economics or demographics. The takeaway was not supposed to be to write a longer EIR—it was to REVISE THE 2012 ZONING PLAN so it synchronized with growth and needed housing. Instead this Plan has catastrophic effects on historic buildings and existing affordable housing, promotes lopsided growth, and ignores infrastructure .

.Fran Offenhauser- real estate investor, preservationist, architect, historic architect, former co-planner for 1988 Hollywood Community Plan, co-founder of Hollywood Heritage, affordable housing developer



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

Craig Weber
201 N. Figueroa Street, 4th Floor
Los Angeles, CA 90012
Phone: (213) 482-7077

RE: Preservation Issues with the Hollywood Community Plan Update CPIO

Dear Craig,

Hollywood Heritage has been asked to clarify and provide additional information on key issues within our responses, both verbal and in writing, to the Hollywood Community Plan and its CPIO. The following provide this information and should form the basis for implementation discussions and the role of OHR as the Plan moves forward. They assume that Ken Bernstein, as the city's designated Preservation Officer, will use the city's CLG status and the programs developed by OHR in administering the City's local ordinances for HCMs and HPOZs as a mechanism for determining processes which can protect Hollywood's identified and designated resources from development pressures (upzoning and density bonuses) currently in the Plan. All resources identified by survey efforts and designated by any level of the federal, state, or local processes should be identified correctly, be treated equitably, and robustly protected the Plan and its implementation processes.

Hollywood Heritage bases its advocacy for historic resources on its statement: "The past is our heritage. The present is our responsibility, and the future is our challenge." We take this responsibility seriously, and words in the goals and objectives of the Community Plan seem to suggest that the City shares these values. However, without more robust implementation, incentives, and definition of review processes, we will not achieve these mutual goals.

Hollywood Heritage wishes to emphasize that the retention of identified historic resources plays a role in the retention of existing affordable and RSO housing, much of which is contained in identified historic buildings. The retention of these buildings is a way of maintaining equity in historic preservation so that all citizens can enjoy and value these resources.

- 1. Hollywood Heritage believes that the Community Plan and the CPIO does not contain adequate protections for the nationally recognized Hollywood Boulevard Commercial and Entertainment District. Given that the District was listed in the National Register in 1985 and was identified according to existing criteria at the time, additional survey work to identify key components of the district based on today's NR guidance and subsequent contexts is needed.**

The Hollywood Boulevard Commercial and Entertainment District, is listed on the National Register at the national level of significance. This is the highest level of significance available, and it therefore is Hollywood's most significant resource. The Boulevard's period of significance currently ends in 1935, 50 years before the 1985 designation (the current threshold for eligibility on the National Register). If the district were being proposed today, buildings with construction dates prior to 1971 would be eligible for inclusion. In the decades since the District's creation, Hollywood Heritage has continued to do extensive research on the Boulevard and has evidence that the period of significance extends to 1964. A district which reflects the amended period of significance would encompass buildings built between 1935 and 1964 which contribute to the architectural, historic, and cultural significance of Hollywood as defined by the existing district nomination and subsequent context statements. The Walk of Fame, currently evaluated as a separate resource, is clearing a character-defining feature of the district and should be made part of an amended/updated resource to give a more complete picture of the development history of the Boulevard and put that important resource in context. Given that the status of many non-contributors would change due to an amended period of significance, reaching 50 years of age and cultural contexts, all non-contributors and other associated features should be re-evaluated and more recent contextual information added to the existing profile.

Unfortunately, the latest CRA survey did not include a survey of this district. In keeping with SurveyLA methodology, existing districts are not resurveyed. However, this practice has resulted in a lack of clarity about the District's true significance and the contributions of its buildings (culturally, socially, and architecturally) built between 1935 and 1964. In the meantime, in keeping with SurveyLA methodology, the current evaluation of "6" used to define non-contributors should be replaced with the "QQQ" status code. This status code, used in SurveyLA methodology, identifies properties that require further study. "QQQ" is therefore an appropriate designation for these properties until the actual status can be determined. For planning purposes, all parcels and addresses which front on the Boulevard between the existing east/west boundaries of Argyle and Sycamore should be included.

Hollywood Heritage requests that all projects on the Boulevard be subject to CEQA assessment, as each individual project will have an effect on the designated district as a whole. It is the collection of buildings and features that make the area valuable. Infill guidelines which conform to the Secretary of the Interior's Standards are a start, but the demolition of actual historic fabric weakens the authenticity of the collection. A robust TDR program which is genuinely useable and the inability to combine lots would be two other mechanisms to preserve the District's integrity.

- 2. The part of the Community Plan Area formerly known as the CRA Redevelopment Area included approximately 60 individual eligible resources evaluated as 5S3s. These resources, some of the oldest in Hollywood, are missing from the CPIO and the Plan. They should be restored to the list of eligible resources in order to provide a complete picture of Hollywood's historic development.**

According to SurveyLA methodology 5S3s are resources that "Appear to be individually eligible for local listing or designation through SurveyLA or other survey evaluation." Out of the 60 5S3s not part of a designated district, all were built before 1930, a period of great historic significance in Hollywood and one in which demolition in recent years has significantly altered our ability to tell the story of

Hollywood's growth and development through the built environment. The vast majority (57) were built before 1925, and constitute some of the rarest housing stock in the Plan area. They belong to two of the most significant development periods in early 20th century Hollywood. Many of these buildings tell the story of pre-annexation Hollywood, when Hollywood was a separate city. Others are from the first development period after annexation, coinciding with the rise of the film industry and the changes incorporation brought. Sixteen are multifamily residences, and thirty-seven are single family homes. Most house lower income and tenant populations at risk of displacement. A few examples of this type of housing stock exist in identified districts, but that is not sufficient to convey the significance of this rare population.

The removal of this category of eligible resource creates an imbalance in the Plan. Individual 5S3s remain in the areas surveyed by SurveyLA. The Plan should protect all identified resources throughout the Plan equally. Furthermore, these resources are defined as resources under CEQA and projects impacting them should be assessed under those guidelines. No explanation has been given for the removal of these buildings from the list of identified historic resources with the Plan Area. This damages the integrity of the survey process the City is relying on to identify its resources and seems arbitrary and capricious and based on factors other than survey criteria. Because these resources are primarily in lower income areas of the Plan, this does not seem equitable.

3. Additional survey for CA Reg districts

Four other historic districts with a 2D2 rating -- Afton Square, Serrano, Selma La Baig, and Vista del Mar / Carlos -- were added to the California State Register in 1994 and 1995 as the result of a federal consensus determination process. Since then, various consultant reports have defined contributors and noncontributors differently within these districts as individual CEQA and other analyses have been prepared. However, there has been no standardized process to redefine contributors or boundaries since their creation in 1994/ 1995. The 2020 survey excluded all previously surveyed resources, saying that "Numerous properties within the Survey Area have already been designated and were not evaluated as part of this survey project." All properties within each of the four California Register district boundaries are included on the 511 list. Properties labeled noncontributors by consultant surveyors should be given a "QQQ" status code until there is an established process to determine if they can be rehabilitated and returned to contributing status.

The procedures for development in these designated districts should be as robust as those for designated HPOZs, with buildings defined as "contributors, altered contributors, and non-contributors." A procedure for assessing the feasibility of rehabilitating current non-contributors built during the period of significance should be defined and implemented before demolition is allowed.

4. Equity Issues

Historic properties and affordable housing: Hollywood's historic housing stock is an important part of the neighborhood's affordable housing. 40% of Hollywood's historically significant residential buildings are multifamily apartments or bungalow courts, and 10% are duplexes, triplexes, or quads (just over 300 properties). Built before 1978, they are covered by the Rent Stabilization ordinance. According to *Preservation Positive*, older multifamily housing is significantly more affordable than newer housing; average rents for studio apartments built before 1980 are 40% lower than those built today. RSO buildings are frequently targeted by developers who see the "upside" potential and evict long term tenants to increase their profits. Protecting historic resources disincentivizes or prevents the demolition of housing.

Data from HCIDLA and SAJE reveal that new, market-rate and luxury units have higher vacancy rates than pre-1980 market-rate housing stock. However, pre-1980 below-market rate units have a higher vacancy rate than new below-market rate units. This data supports the argument that low-income residents are being displaced from older affordable housing as part of a speculative process.

There is direct correlation between historic housing and affordable and rent stabilized housing. The choice to exclude 60 resources of local significance from the CPIO exacerbates the issue of keeping tenants housed in Hollywood (see 5S3 section).

Transparency and access: Part of the Redevelopment Plan's commitment to historic preservation was that information about historic resources would be comprehensive and publicly accessible. Hollywood Heritage created a "511 list" based on Section 511 of the Redevelopment Plan. This list is an inclusive, centrally-located, parcel-by-parcel list of historic resources in Hollywood. It fulfills a central obligation of the CRA's agreement with Hollywood Heritage. While the 2019 survey, ZIMAS, and My Historic Places all contain partial data sets, there is not yet one all-encompassing list organized in a fashion that is searchable by the public.

The 2020 report on the CRA website grouped resources into distinct documents, organized by evaluation and address: individually evaluated resources are listed in Appendix A, non-parcel resources in Appendix B, properties within historic districts and planning districts in Appendix C, and previously designated resources in Appendix D. Correspondence from survey consultants stated, "Data about designated properties in the Hollywood Redevelopment Plan Area is already available to the public via HistoricPlacesLA.org and ZIMAS. All of this information is currently available via the searchable, online map of HistoricPlacesLA. Once the Survey Report and its findings are finalized, they will be integrated into these same databases, alongside the existing data for designated resources."

However, this data has yet to be integrated. According to the Office of Historic Resources, "HistoricPlacesLA currently includes a significant percentage of data on resources listed as City Historic-Cultural Monuments (HCMs) and Historic Preservation Overlay Zones (HPOZs). Data on these resources, and resources designated under state and federal programs will be enhanced over time. Until then, look for designated properties on ZIMAS." Information about historic resources included in HistoricPlacesLA and ZIMAS can be accessed by typing an address into the search box or through the map view. HistoricPlacesLA also provides a link to download the full SurveyLA report for the Hollywood Community Plan area.

Sincerely,



Brian Curran
President, Hollywood Heritage, Inc.



Wednesday, March 17th, 2021

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

Re: Hollywood Community Plan Update No. 2
CPC-2016-1450-CPU
ENV-2016-1451

Dear Ms. Millman:

HHWNC is the largest certified Neighborhood Council in the City of Los Angeles. At HHWNC's monthly board meeting held last night, March 17th, the following motion was adopted by a vote of 18 yay to 0 nay.

It is well-known that HHWNC's huge area encompasses many diverse communities stretching between the borders of "Downtown Hollywood" to West Hollywood to Studio City to Burbank.

On February 18th, 2021 at a public meeting, your CPC Commissioners mischaracterized areas within HHWNC boundaries. Our HHWNC boundaries include much more diversity than several of your commissioners alleged to the public as well as fellow Commissioners. Those comments struck many participants and stakeholders as racial and/or racist stereotyping, ageist, anti-historical preservation and, to some who have a long memory, as sour grapes, and gripes for one Commissioner, David Ambroz, who had lost an election some years ago to represent the Sunset/Spaulding Square Area 7 portion on HHWNC's board. This very portion, also known as Corridor 5, was the actual subject of discussion.

HHWNC's volunteer Board is elected, not hand selected, and open to all qualified Stakeholders. HHWNC's Board membership has been diverse since HHWNC's 2002 founding. The various seated Boards and Area Stakeholders have worked tirelessly for twelve years now with the City's Planning Department and different CD4 representatives to make the Hollywood Community Plan Updates 1 and 2 reflect the neighborhoods' desires for preservation, while still encouraging appropriate growth.

Any observation of the multiple buildings along La Brea south of Franklin Avenue clearly illustrates a portion of the massive development that has occurred within our borders. HHWNC has never objected to a development that has guaranteed the protection of residents being evicted and provided with appropriate compensation and TRULY affordable housing options. Sadly, this has not been the case. Instead of creating new "affordable" housing, many of these "projects" were diverted to small hotels in Hollywood, some of which have become AirBNBs, and all leaving many of our stakeholders homeless.

A particular location in which HHWNC has supported appropriate growth is on the Sunset Boulevard Corridor, which is a narrow commercial strip running down the middle in between two large Historic Preservation Overlay Districts to the South and North of the boulevard. HHWNC's support for the two-block project underway at 7400/7500 Sunset Boulevard is a good example where HHWNC has supported appropriate growth.

HHWNC requests and urges the City Planning Commission to revisit the aforementioned Sunset Boulevard Corridor 5 issues and adopt the Planning Department's staff current recommendations as appropriate for the narrow corridor running in between the two HPOZs. The Sunset Boulevard Corridor 5 issue(s) should be considered in the context of what the proposed plan is, which is "a community plan". The CPC Commissioners comments on February 18th that Corridor 5 height limitations and FARs should be increased to support "the regional center" in the core downtown Hollywood area would undercut the HCPU2 draft's goal of preserving a good balance of future growth in that corridor with the adjacent HPOZs.

HHWNC urges the City Planning Commission to adopt the Planning Department's staff recommendations in the Hollywood Community Plan Update 2 for Corridor 2 and 5 on Sunset Blvd. as it was presented on February 18th. Those recommendations reflect lengthy in person meetings and discussions between and among several different HHWNC boards, renters, home and condo owners, the local residents' associations, and the department. Those current HCPU2 draft provisions would allow for significant increases in height limitations and FARs on the Sunset Boulevard corridor.

HHWNC also urges the City Planning Commission to direct the Planning Department to release the draft Final Environmental Impact Report so that there can be some transparency as to what is now in, and what is now out of, the HCPU2.

Kind regards,



Anastasia Mann, President, Hollywood Hills West Neighborhood Council



Orrin Feldman, First Vice President. Hollywood Hills West Neighborhood Council

Cc: City Planning Commission CPC@lacity.org

Vince Bertoni, Planning Department Director Vince.Bertoni@lacity.org

Kevin Keller, Planning Department Executive Officer Kevin.Keller@lacity.org

Councilmember Mitch O'Farrell

Councilmember Nithya Raman Nithya.Raman@lacity.org

Councilmember Paul Kerkorian Paul.Kerkorian@lacity.org

Councilmember Paul Koretz Paul.Koretz@lacity.org

Orrin Feldman, First Vice President, HHWNC vicepresident@hhwnc.org

Anastasia Mann, President, HHWNC president@hhwnc.org



Changing of height restrictions on Hillhurst

1 message

Ilia <ilia_222@yahoo.com>

Wed, Mar 17, 2021 at 1:45 PM

To: "priya.mehendale@lacity.org" <priya.mehendale@lacity.org>, "sophia.kim@lacity.org" <sophia.kim@lacity.org>, "linda.lou@lacity.org" <linda.lou@lacity.org>, "contactCD4@lacity.org" <contactCD4@lacity.org>, "nithya.raman@lacity.org" <nithya.raman@lacity.org>, "sarah.tanberg@lacity.org" <sarah.tanberg@lacity.org>, "cpc@lacity.org" <cpc@lacity.org>

Have just heard that Nithya Raman is advocating that the height limit be removed on Hillhurst and that no parking spaces be required for new buildings built in Los Feliz.

If this goes through I will not vote to reelect any city officials who have anything to do with this. I am unable to make the meeting tomorrow morning but I would like it to be known that I am TOTALLY against the height restrictions being changed AND there is already a terrible parking problem in the neighborhood (I live on Russell Ave between Hillhurst and Vermont). Residents often have to walk blocks away to find parking. Forget about during the day! With all the restaurants on Hillhurst there is NEVER any parking and those patrons use our residential streets to park on often blocking driveways. Adding more buildings without requiring them to have ample (and I mean AMPLE!!!) on site parking is NOT good. I do not approve and once again will not vote for any elected official encouraging this.

Raman's request to eliminate height restrictions does NOT represent the feelings of the community and was sent without any input from the residents. I only just heard about it today (March 17th) through a neighbor.

Ilia Carson-Letelier
Los Feliz Resident



(no subject)

1 message

Jennifer Anderson <jennipenny@gmail.com>
To: cpc@lacity.org

Tue, Mar 16, 2021 at 9:57 PM

As a resident of Los Feliz for 23 years, I oppose the removal of height limits, removal of density limits, and removal of parking. Los Feliz is one of the last walkable neighborhoods left in Los Angeles. By letting the developers have a free for all without restrictions, will destroy what is left of Los Feliz. And it will push out residents that have been here for decades, causing a further housing crisis. Please save Los Feliz.

- No removal of height limits
- No removal of density limits
- No removal of parking

Jennifer Anderson
Resident of Los Feliz for 23 years



Screenshot_20210316-213441_Nextdoor.jpg
972K

9:34



NO, NITHYA. NO UPZONE. NO SKYSCRAPERS.

KEEP LOS FELIZ: IN LOS FELIZ



Councilmember Nithya Raman's surprise last-minute changes to the Hollywood Community Zoning Plan completely took out the community by stripping away building height limits, increasing density, and removing parking. All WITH ZERO INPUT from us, her constituents.

GO: bit.ly/2Qbf4Pb
MAIL: CPC@LACITY.ORG **CALL: 213.473.7004** **TWEET: @CD4LOSANGELES**

TELL HER NO! BY MARCH 17TH





Planning CPC <cpc@lacity.org>

Los Feliz Height Reductions

1 message

Jane Barrett <janebarrett@hotmail.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 6:07 PM

As a 40 year resident I can only say this is truly ridiculous. Why would you want to destroy a great neighborhood? This needs to be defeated.

Sent from my iPhone



Planning CPC <cpc@lacity.org>

Change of planning in Los Feliz

1 message

Judie Carson <jcarson2521@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 4:52 PM

I was just informed about meeting tomorrow morning regarding changing height restrictions in Los Feliz. I own property on Hillhurst. I am completely against this change of zoning. It effects me directly and I am saying NO. Judie Carson



In regard to the Hollywood Community Plan Update

1 message

James Chance <jameschance1800@mail.com>

Wed, Mar 17, 2021 at 8:59 AM

To: cpc@lacity.org, contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org, sophia.kim@lacity.org, linda.lou@lacity.org, quetzalli.enrique@lacity.org

Hello,

I am a multi decade Los Feliz resident. I have concerns over the changed proposed by Nithya Raman which modifies height restrictions on Hillhurst Ave.

My concerns stems from other parts of LA where developers have come into communities that they are completely disssconnected from and permanently altered the traffic, look, density and sunlight while completely draining the resources of said communities. It is apparent by most of the empty large scale projects (see a lot of geoff palmers failed buildings for example) are nothing more than a cashgrab for everyone but the people who live there or, even worse, are evicted and replaced. These structures are proven to negatively alter the landscape permanently while often replacing long term low income tenants.

Nithya needs to represent the community and in this case is not. Nothing should be changed that effects the long term residents and homeowners without extensive input from the people community who live within it and would be directly effected.

I absolutely DO NOT support it this proposal. Nithya has screwed this up. If anyone tries to push this through I will do everything within my power to make sure these people are removed from their position and replaced with someone with the communities interest in mind. We are watching and please do not mess this up. Community has to decide this and not a selected few.

James



Hollywood Re: A note from Nithya Raman - city council candidate in your district!

1 message

Jennifer Eno <jennifereno@gmail.com>

Wed, Mar 17, 2021 at 2:33 PM

To: nithya@nithyaforthecity.com, cpc@lacity.org, contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org, sophia.kim@lacity.org, linda.lou@lacity.org, quetzalli.enrique@lacity.org

Cc: eno@jennifereno.com, Brett Cody Rogers <brettcodyrogers@gmail.com>, harpreet.k.malhi@gmail.com, edward@dilkes.us, Jennifer Eno <jennifereno@gmail.com>, jennifer@indigenoux.com, Jennifer Monsalvez <jennifermonsalvez@yahoo.com>, Robert Kolcon <robkolcon@mac.com>, jack@urban-california.com, tommywoelfel@hotmail.com, julieanngaldames@gmail.com, lapistola@gmail.com, ealovins@yahoo.com

Hello Nithya,

We met a little over a year ago (see attached photo from the pre-mask days of March 2020) at a Nithya for the City event hosted by Charlotte Lerchenmuller at her home in Silver Lake. We are so thrilled that you are now our City Councilmember! All of our efforts and signs in our yards worked :-).

Today, I am reaching out to you and staff at the behest of a group of concerned Los Feliz neighbors cc'd here and local constituents (similar to our gathering at Charlotte's, but distanced and over email) with regards to the Hollywood Community Plan Update. We are most concerned about Up-Zoning potentially happening in Los Feliz Village along Hillhurst, Vermont, and Los Feliz Boulevard. We have homes within those environs and also between Vermont and Western Ave, and The Oaks close to Griffith Park, all north of Franklin Avenue.

We are hoping to be able to provide local constituent and community input to you and your staff before a decision is made. I'm personally not sure if a decision is about to be made at tomorrow's City Planning Commission meeting, 3/18/21 at 8:30 am, but our neighbors are feeling a sense of urgency to get in touch with you.

There is a level of concern that the process around this new Hollywood Community Plan Update does not follow the established process of years prior where there were opportunities for community input and feedback to our City Councilmember by various local constituents and groups to have their voices heard. That said, we know this is a monumentally difficult time to have face-to-face meetings and an exchange of ideas during the Covid-19 lockdown. Perhaps there's an opportunity to allow for this process and have these important local voices heard before a final decision is made?

We would love to hear your thoughts and the status on the Up-Zoning decision. Would you consider a meet-up at an outdoor distanced masked setting such as Trails Café or Franklin's Café & Market in Griffith Park?

We do oppose Up-Zoning on Hillhurst and Vermont in Los Feliz. We shudder at the thought of our unique, charming, walkable Los Feliz neighborhood becoming something akin to "Century City East." That said, we are also all for progress and innovation and believe there's a balance that can be achieved.

We support you, Nithya, and hope you can support us having our voices heard.

Kindest regards,

Jennifer Eno

4548 Ambrose Ave
Los Angeles, CA 90027

On Sun, Mar 1, 2020 at 11:45 AM Jennifer Eno <jennifer@indigenoux.com> wrote:

Dear Nithya,

Thank you so much for reaching out! It's really wonderful that you are connecting with constituents directly like this -- and I couldn't agree with you more.

Apologies for the delayed receipt of your email and reply; and YES, I am working with my team on a digital solution to streamline homeless services that we have pitched to LA County's Tech Innovation Challenge. It's called **Under One Roof**, and I've attached a PDF with our submitted proposed solution and mobile website design to this email.

Some background on me: I'm a woman who has been working in the tech and media industries for the past 25 years. I pioneered digital media and products at WIRED in San Francisco in the mid-90s and went on to establish and drive digital content and solutions for major media companies (CBS, MTV, Warner Bros. Records, Time Inc., Nickelodeon), LA-based start-ups, ad/marketing/branded content agencies, academic institutions, and most recently for the U.S. government with the National Institutes of Health's groundbreaking *All of Us Research Program*. In working with the NIH over the past 4 years, we have become experts in creating relevant digital solutions that are engaging and accessible to diverse underserved low-literacy populations around the country.

I've formed a new digital firm with my two right-hand women of the past 10 years -- Brigid Buckman, a brilliant user experience strategist and designer, and Lucinda Brown, a true unicorn digital design director meets civil engineer -- called Indigeno (pronounced In-dig-en-OH). We feel we are well suited to take on the challenge and craft solutions for the Tech Innovation Challenge's centralized customer portal to make homeless services information more accessible to its users and streamline the entire process on the backend to effectively get the efforts of all involved agencies "Under One Roof."

I'd love to connect with you and hear your thoughts. We are pulling for you in the election, Nithya!

Thank you so much again,
Jennifer Eno

On Sat, Feb 29, 2020 at 12:41 PM Jennifer Eno <jennifereno@gmail.com> wrote:

----- Forwarded message -----

From: **Nithya Raman** <nithya@nithyaforthecity.com>
Date: Wed, Feb 12, 2020 at 5:33 PM
Subject: A note from Nithya Raman - city council candidate in your district!
To: <jennifereno@gmail.com>

Dear Jennifer,

One of my colleagues Kylie said that she had a great conversation with you at your door a couple of weeks ago. She mentioned that you're working on an app for streamlining homeless services!

I'd love the opportunity to hear more about what you're working on, and also to tell you more about my platform. One of the primary reasons that I decided to run was because I was extremely frustrated with the system we have set up in Los Angeles to provide services to those experiencing homelessness.

I really think that we could do so much more as a city to address the housing and homelessness crisis - not just to help the homeless, but to keep people who are about to lose their housing in their homes, to reduce rents, and to build far more deeply affordable housing.

I'm at 323-[redacted] if you're available to speak, or I can be reached by email here!

Look forward to hearing from you!

Warmly,
Nithya

More information about our campaign:

My [launch video is here](#), and it's been watched over a quarter of a million times!

I have released four detailed policies which are available on the website, [one on housing and homelessness](#), [one on the environment](#), [one on protecting immigrant residents](#), and [one on making City Hall work better for all of us](#).

Through these policy releases, we want to show voters exactly how we would use the powers of the Council to advance a more just Los Angeles, where all of our residents can truly thrive.

Finally, we are quite active on social media - our [Twitter feed](#) and [Instagram](#) are here, if you'd like to follow us!



nithyaforthecity.jpeg
687K



Planning CPC <cpc@lacity.org>

Los Feliz

johnny tellez <johnnytellez@sbcglobal.net>

Tue, Mar 16, 2021 at 4:33 PM

To: cpc@lacity.org

Cc: nithya.raman@lacity.org, sarah.tanberg@lacity.org

As a long term resident & business owner of almost 30 years.

Raman's request to eliminate height restrictions does NOT represent the feelings of the community and was sent without any input from the residents.

As a Los Feliz stakeholder, I'm concerned the proposed Hollywood Community Plan Update has undergone last-minute changes that have not been properly or adequately reviewed by the community at large. City Councilmember, Nithya Raman, has requested changes that have had little or no community input, nor accurately represent the viewpoints of the residents she purportedly represents. If the plan is to be modified from the previous versions that did receive input, then the community should be allowed to make their thoughts known before any final approval is given.

Johnny Tellez



City Planning Commission Meeting-March 17, 2 021 re: Hollywood Community Plan

1 message

jwilkins1627@roadrunner.com <jwilkins1627@roadrunner.com>
Reply-To: jwilkins1627@roadrunner.com
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 5:05 PM

City of Los Angeles Planning Commission

Reference: Hollywood Community Plan

Commissioners:

I am a resident of the Los Feliz/Silverlake communities since 1974 and I strongly oppose any and all changes increasing the 36 ft. height limitation on [Hillhurst Avenue, Los Angeles 90027](#) without the implicit approval of the community. This is the first time I've learned of Nithya Raman's, our CD4 Councilmember, request for the elimination of the 36 ft. height limit and distressed to learn about it in the LA Times and from my neighborhood association just one day before it is presented to the City Planning Commission to vote this week.

Not only would this have a negative impact on our small business village community and close knit-pedestrian friendly neighborhood, it would disastrously effect the already 24/7 traffic on Los Feliz Blvd. Hillhurst Avenue is a major artery to Los Feliz Boulevard which is one of the most congested roads in the City of Los Angeles. The current situation is becoming untenable with Hillhurst traffic spilling over to adjacent Commonwealth Ave., Griffith Park Blvd., Rowena Ave., and Franklin to name a few.

I am not opposed to development or redevelopment. I agree Los Angeles is in dire need of affordable housing in order to thrive and we must eliminate the bulk of our homeless population through providing critical services and housing. However, all must be implemented with the input from the community as a whole.

Successful, prosperous cities are only possible through careful, thoughtful master planning which , includes design, height limits, traffic, and other infrastructure rather than piece meal, case-by-case basis. But input from all effected communities is imperative and will also lead to diminishing corruption by wealthy developers.

Sincerely,

Judith D. Wilkins

[2449 N. Commonwealth Ave.](#)

[Los Angeles, CA 90027](#)

Jwilkins1627@roadrunner.com



FW: City Planning Commission Meeting-March 18, 2021 re: Hollywood Community Plan

1 message

jwilkins1627@roadrunner.com <jwilkins1627@roadrunner.com>
Reply-To: jwilkins1627@roadrunner.com
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 5:20 PM

City of Los Angeles Planning Commission

Reference: Hollywood Community Plan

Commissioners:

I am a resident of the Los Feliz/Silverlake communities since 1974 and I strongly oppose any and all changes increasing the 36 ft. height limitation on [Hillhurst Avenue, Los Angeles 90027](#) without the implicit approval of the community. This is the first time I've learned of Nithya Raman's, our CD4 Councilmember, request for the elimination of the 36 ft. height limit and distressed to learn about it in the LA Times and from my neighborhood association just one day before it is presented to the City Planning Commission to vote this week.

Nithya Raman has requested changes that have little or no community input nor does it represent the viewpoints she purportedly represents. If the plan is to be modified from the previous versions that did receive input, then the community should be allowed to make their thoughts known before any final approval is given.

Not only would this have a negative impact on our small business village community and close knit-pedestrian friendly neighborhood, it would disastrously effect the already 24/7 traffic on Los Feliz Blvd. Hillhurst Avenue is a major artery to Los Feliz Boulevard which is one of the most congested roads in the City of Los Angeles. The current situation is becoming untenable with Hillhurst traffic spilling over to adjacent Commonwealth Ave., Griffith Park Blvd., Rowena Ave., and Franklin to name a few.

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Successful, prosperous cities are only possible through careful, thoughtful master planning which , includes design, height limits, traffic, and other infrastructure rather than piece meal, case-by-case basis. But input from all effected communities is imperative and will also lead to diminishing corruption by wealthy developers.

Sincerely,

Judith D. Wilkins

[2449 N. Commonwealth Ave.](#)

[Los Angeles, CA 90027](#)

[Jwilkins1627@roadrunner.com](mailto:jwilkins1627@roadrunner.com)



No input from residents?

1 message

Kris McGaha <tildyfilm@yahoo.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 1:17 PM

Hello,

Nithya Raman's request of zone change and eliminating height restrictions in Los Feliz is wrong. This should not be done without getting input from the community that live there. It is very worrisome and her approach to this lacks transparency and community oversight. This is frankly unethical.

I oppose her request.

Kris McGaha



Planning CPC <cpc@lacity.org>

Against up zoning Los Felix

1 message

Kathy Metz <metz.kathy@yahoo.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 9:04 PM

I am a long time resident of Los Feliz, I am shocked to hear that our council member representative is pushing up zoning in Los Feliz with out any feed back from the residents. This is wrong and the community should have a right to comment on these decisions. I am very much against this action, I feel that it will ruin the uniqueness of this beautiful area. Will increase parking and traffic problems, along with a decrease in affordable housing. Sincerely, Ms. Kathy Metz, a resident on Rodney Dr.

Sent from my iPhone



Planning CPC <cpc@lacity.org>

Opposition to request to eliminate height restrictions

1 message

Kev Robertson <mrkr@prodigy.net>
To: cpc@lacity.org

Tue, Mar 16, 2021 at 9:46 PM

On Hillhurst and other Los Feliz areas. This will drastically alter the village feel of the neighborhood and should not be allowed.

Sent from my iPhone



Planning CPC <cpc@lacity.org>

Los Feliz Community Planning

1 message

Lucia Marano <lucestella@me.com>

Wed, Mar 17, 2021 at 10:57 AM

To: cpc@lacity.org

Cc: contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org

Raman's request to eliminate height restrictions does NOT represent the feelings of the community and was sent without any input from the residents.

Thank you,
Lucia Marano

Sent from my iPhone...somewhere in time & space...



Planning CPC <cpc@lacity.org>

800 & COUNTING SIGN PETITION in support of SUNSET BLVD. CORRIDOR 5 CPIO DRAFT

Lesley O'Toole-Roque <lesleyotooleroque@gmail.com>

Thu, Mar 18, 2021 at 9:59 AM

To: cpc@lacity.org

City Planning Commissioners,

Please see a copy of a petition set up by stakeholders in Hollywood's Sunset Boulevard Corridor 5, asking that our original CPIO draft be approved today.

We must save our small businesses and existing affordable housing and seek EQUITY for ALL our STAKEHOLDERS.

https://www.change.org/p/jeff-kalban-equity-for-all-residents-smbiz-school-families-save-zoning-draft-sunset-blvd-corridor-5?utm_content=cl_sharecopy_27853942_en-US%3A3&recruiter=64546661&utm_source=share_petition&utm_medium=copylink&utm_campaign=share_petition

Thank you for your attention.

Lesley O'Toole-Roque

--

Lesley O'Toole-Roque

Office: 323 882 6268

Cell: 323 397 6319



Concerned Los Feliz resident expressing opposition to zoning changes

1 message

L S <ls2001ls@yahoo.com>

Wed, Mar 17, 2021 at 7:22 PM

Reply-To: "ls2001ls@yahoo.com" <ls2001ls@yahoo.com>

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

Hello,

My name is Leslie Sloan and I have been a resident and home owner in Los Feliz for 15 years. I chose to live here for the character of the old buildings and the small community feel along other things. I've sadly seen a lot of changes in Los Feliz during this time. Beautiful old craftsmans are being knocked down left and right to build characterless boxes with windows. Somehow we still managed to keep out large-scale retailers and maintain a community more Mom and Pop feel.

But hearing now that there is a desire by Nithya Raman to upzone, or increase the height requirements, is very concerning. This will undoubtedly change forever the charm that makes Los Feliz what it is. The real estate will become far too valuable and will make large developers scoop everything up to build large buildings. There will be no turning back from this.

And the argument that this is being done to help the homeless situation to me holds no water. They're building large buildings around us continuously. Why not rent those first? And I feel very skeptical that the amount of low income apartments in these new buildings really does anything to dent the surface of the problem. It just creates more luxury apartments that are ridiculously expensive.

But I think what makes this even more frustrating is the fact that it seems that there was extremely limited community involvement and approval, if any at all. This is not how things should be done, especially here in Los Feliz.

Please do not allow this change to Los Feliz! We do have a lot of homeless problems around us, but this is certainly not the answer.

Thank you,
Leslie Sloan
Kingswell Ave



advocacy and action
for Los Feliz

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Mary Beth Sorensen

Angela Stewart

Gail Zaritsky

*Past President

City Planning Commission
Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012
Via email: cpc@lacity.org

**RE: Response to February 18, 2021 City Planning Commission Hollywood
Community Plan Update meeting**

March 16, 2021

Members of the City Planning Commission,

The Los Feliz Improvement Association (LFIA), the advocacy group for all residents of Los Feliz since 1916, is asking you to approve and recommend adoption of the height restrictions on Hillhurst Avenue in Los Feliz, as submitted in the Draft Hollywood Community Plan Update.

The stakeholders of Los Feliz are a diverse mix both ethnically and socio-economically and live in a wide range of multi-family and single-family housing. The neighborhood is low scale and one of the stated objectives of the Plan is to preserve lower-scale neighborhoods.

Much of Los Feliz was dismayed at CD4 Councilmember Nithya Raman's request for elimination of the height restrictions in her February 17, 2021, letter to the City Planning Commission. Considerable effort was put into formulating a plan for Hillhurst that was right for the neighborhood, and our newly elected Councilmember took it upon herself to request this change without any input from the community.

Los Feliz has a vibrant business community composed largely of small businesses. It does not lie within the Update's proposed CPIO and should not be treated as such. Encouraging development of new, taller structures requires corporate retail tenants on the first floor in order to be financially viable. Giving developer incentives to create taller structures without consideration of the scale and socio-economic diversity of the neighborhood will absolutely displace our local businesses and change the village-like setting of the commercial district, a characteristic often cited when describing Los Feliz. Retaining our height limit encourages adaptive reuse of buildings and keeps affordable commercial space available for lease to serve the surrounding community.

Los Angeles has always had a diversity of neighborhoods and housing types. People like to live in different types of environments, and we have to find ways to increase affordable housing that allow for those differences. Using means that go beyond up-zoning and incentivizing developers is going to be necessary, such as putting a vacancy tax in effect immediately, preserving historic housing and exploring government subsidized housing options.



advocacy and action
for Los Feliz

CPC HCPU Response page 2

I would be remiss if I did not also address the comments made at the February 18, 2021, meeting about access to Griffith Park, which is situated in Los Feliz. We applaud Commissioner Yvette Lopez-Ledesma's attention to this issue because LFIA has been fighting to improve access to Griffith Park for years. The commissioners focused particularly on Los Feliz Boulevard, but that is just one of the many ways to access the park. However, the problem with park access along Los Feliz Boulevard is not the surrounding single-family homes; it's the gridlocked traffic.

Contrary to Lopez-Ledesma's statement, Griffith Park is not "highly inaccessible" (about 10 million people visit each year) but if you want to improve access you need to improve public transportation to and within the park. Adding density on Los Feliz Boulevard would increase the number of people who can live near the park, which is great for those people, but it will also increase traffic in the area, which will continue to create problems for people who are not lucky enough to live in proximity.

Thank you for consideration of these important issues.

If you need any of these comments elaborated, we are at your service.

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

CC (via email):
Nithya Raman, CD4
Sarah Tanberg, CD4
Meg Healy, CD4
Mashael Majid, CD4
Planning Staff



Planning CPC <cpc@lacity.org>

Re changes to Los Feliz zoning

1 message

Miriam Birch <birchpro@earthlink.net>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 11:49 AM

NO NO NO.

I have a lived her my whole life. Changes in downtown Hollywood have been BAD .

NO UPZONING, PLEASE,

Miriam Birch
2400 ST. GEORGE ST.



Planning CPC <cpc@lacity.org>

You

1 message

Miriam Birch <birchpro@earthlink.net>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 11:52 AM

We will vote you OUT if up zoning takes place.

Miriam Birch



Hollywood Community Plan Update

1 message

Michael Cuneo <mcnevnev@roadrunner.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 9:54 AM

My family has lived in Los Feliz for 23 years and we are extremely upset about the plan to eliminate height restrictions on Hillhurst Avenue, to allow for taller, denser structures, exceeding our current "low-rise" height of 36' per the request of City Councilmember Nithya Raman.

The traffic and parking issues have already hurt this great community. We don't need any more franchise shopping companies moving in and pushing out the boutique small businesses! We have the massive Glendale Mall and Americana if we choose to see that and go shopping in that environment. We don't need Century City East here when Hollywood is already turning into that.

Please do NOT allow this.

Thank you.

Michael Cuneo
[2330 N Edgemont St](#)
[LA, CA 90027](#)



DO NOT lift height restrictions on Hillhurst

1 message

Melissa Gage <melissagage@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 10:17 AM

Hello,

I have lived in Los Feliz for nearly 15 years. I lived in the same courtyard apartment on Los Feliz Boulevard for 14 years, and after years and years of saving I purchased a little house on Rodney, where I have lived with my son since December. My 8-year-old son goes to Franklin Avenue Elementary, two blocks from our house.

I could not be more appalled and disappointed by Councilperson Raman's desire to lift height restrictions on Hillhurst — with zero community input.

My entire community in Los Feliz (who live in both houses and apartments) are **STRONGLY OPPOSED** to lifting height restrictions. Beyond pushing out the small businesses that are already struggling to survive in our neighborhood, it will make our streets much less safe for our children by increasing traffic.

There are many empty lots where buildings have been torn down, along with parking lots, that could provide space for affordable housing:

- The lot on Berendo & Hollywood (Steve Allen theater) which is now home to a gang.
- The empty lot on Russell nearly Hillhurst / next to CitiBank where a craftsman was torn down by the bank years ago, and remains empty and fenced off.
- The eyesore property on Melbourne near Hillhurst, where a house was torn down two decades ago and remains a weed-strewn empty lot.
- The abandoned Bates Hotel on Sunset, which has been an eyesore and crime magnet for a decade.

To name just a few ideas ...

I could not be more disappointed that I voted for Raman, and will not make the same mistake twice. It would be one thing if there was proof that lifting height restrictions actually worked, but the fact that so few affordable units will result is completely unacceptable. The fact that she sought no community input is outrageous.

Do NOT lift height restrictions on Hillhurst.

Thank you,

Melissa Gage



Opposition to lifting building height restrictions on Hillhurst!

1 message

Mary Ellen Gorski <maryellen@usa.net>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 6:57 PM

I am writing to express my opposition to the proposal lifting current building height restrictions on Hillhurst Ave.

City Councilmember, Nithya Raman, has requested changes that have had little or no community input and that do not represent the viewpoints of the residents she was elected to represent!

As a 16 year resident of Los Feliz, I'm horrified by this proposal and by the manner in which Councilmember Raman advanced it without the input of her constituents.

If the plan is to be modified from the previous versions that DID receive input, then the community should be allowed to make their thoughts known before any changes are initiated.

Thank you,
Mary Ellen Gorski
4624 Franklin Ave
Los Feliz resident since 2005

Sent from my iPhone



Building Height

1 message

Michael Hawley <hawleymc@pacbell.net>
To: cpc@lacity.org

Tue, Mar 16, 2021 at 10:48 PM

I am a long-time Los Feliz resident and I am vehemently OPPOSED to Ms. Raman's move to eliminate building height restrictions. This move does not represent the wishes or interests of our community. We were not given an opportunity for input on this matter. Please do not move forward on this without first giving the community a chance to voice its thoughts. This is not the community-focused democratic leadership she promised, it is destructive steamrolling. She is quite simply ignoring the community.

Sincerely,
Michael Hawley
Sent from my iPhone



The Hollywood Plan and Los Feliz

1 message

M K <melodymking@gmail.com>

Tue, Mar 16, 2021 at 11:14 PM

To: cpc@lacity.org

Cc: valentina.knox.jones@lacity.org, linda.lou@lacity.org, hollywoodplan@lacity.org, Priya Mehendale <priya.mehendale@lacity.org>, sophia.kim@lacity.org, quetzalli.enrique@lacity.org, contactCD4@lacity.org, councilmember.ofarrell@lacity.org

Dear Commissioners:

We are angry. We recently learned of the changes requested in the Hollywood Plan by Councilmember Raman which were made without ANY community input. We hope that she has heard our voices and will retract her requests.

We are concerned for our neighborhood. Los Feliz is a one-of-a-kind community in Los Angeles, and should be respected as such. Not only because it is one of the last walking neighborhoods in LA, but also because of the history here.

We have architectural landmarks like the Sowden House, the Ennis House, and the Hollyhock House. We have one of the last remaining movie palaces, the Vista Theatre - most were torn down in the 70s during a rash of development, and look how we regret it now. We have Walt Disney's first home, the Barnsdall Art Park, the Greek Theater, the secret staircases, the Shakespeare Bridge, the Observatory, the Zoo, the Dresden since 1954, and the music of Marty and Elaine for the past 38 years. We also live next door to something very special - Griffith Park. After midnight, you're just as likely to see a coyote as a car and it's becoming more common to find a hawk or an owl in your tree. Construction in our area affects more than just our commutes; it affects an entire ecosystem. **We now have many tourists that patronize our local businesses, but we won't if these things are no more.**

We support virtually all housing initiatives to help the homeless. What we do not support is developers creating an artificially low housing supply by withholding 46,000 units from the market. Per the [SAJE Vacancy Report](#), our area currently has a vacancy rate of 16 to 30%.

Why are we rewarding developers who are creating this housing crisis by allowing them to construct MORE buildings? We have plenty of perpetually vacant buildings that could house people right now. And as Melody mentions in [her editorial](#), requiring developers to make a "commitment" to affordable housing is meaningless until Measure JJJ has the loopholes fixed and some kind of enforcement is implemented.

By allowing their greed rather than the market to set the price on the available residential units and creating this shortage, the developers are making money off the backs of the city's most vulnerable. And if you allow it, you are complicit. Shame on you. Instead, institute a vacancy tax. Encourage small-scale development. Keep height limits low. Save Los Feliz.

Melody King and Lawrence Hennigan
Long-time Los Feliz Residents



Los Feliz Development

1 message

MOLLY MAGUIRE <lamoll@scbdistributors.com>
To: CPC@lacity.org

Wed, Mar 17, 2021 at 1:05 PM

ADD MY VOICE to ALL of OF THOSE **AGAINST** the latest effort to bring high rises and malls to Los Feliz.

1. Our rep, Raman HAS NO RIGHT to speak for her constituents in this matter WITHOUT COMMUNITY INPUT
And she also lied about her intentions before being elected. She's a Trojan horse for developers

2. The existing high-rises in Hollywood are occupied far under capacity — we don't need more

3. **Robin Russin** has many wise and creative ideas:

Just emailed this to all the people on the council involved:

As a 30 year resident of Los Feliz, on Melbourne, half a block from Hillhurst, I want you to know how deeply disappointed in and opposed I and my neighbors are to Councilperson Raman's idea of lifting height restrictions on Hillhurst.

She sought absolutely no neighborhood or community input, and everyone I know in the area is strongly opposed to this divisive and disruptive plan, which would ruin the nature and character of our neighborhood — while other better solutions are there.

FOR INSTANCE: the eyesore property on Melbourne near Hillhurst, where a house was torn down TWO DECADES ago and remains a weed-strewn empty lot. Why has this not been public-domained and built on?

FOR INSTANCE: the hideous, abandoned Bates Hotel on Sunset, which has been an eyesore and crime magnet for a decade, and yet could offer many affordable housing units.

FOR INSTANCE: buying out the Scientology Center's properties at the former KCET studio and former hospital on Sunset, which could provide hundreds of units.

And other ideas, none of which would destroy our neighborhood.

I am now profoundly sorry I voted for Raman. What an arrogant, non-inclusive approach she has demonstrated. Voting for her is not a mistake I will repeat, I can assure you, unless she amends the way she treats her co

Finally: You all look like greedy, corrupt snakes in the pockets of greedier developers — you really do.

Most sincerely,
Molly Maguire
24 years in Los Feliz



Planning CPC <cpc@lacity.org>

Los Feliz resident opposed to developer height revisions

m@amp <m@ampcollective.net>
To: "cpc@lacity.org" <cpc@lacity.org>
Cc: "nithya.ramen@lacity.org" <nithya.ramen@lacity.org>

Wed, Mar 17, 2021 at 11:57 PM

Dear CPC and Nithya,

I am a long time Loa Feliz resident and wish to voice my opposition to changing the height limits for development in our terrific neighborhood.

PLEASE DO NOT CHANGE THIS!!!!

We have so many issues as it is already with the more recent rise in crime in our neighborhood.

Thank you,

Mary Maurer



No On Los Feliz Height Increase

1 message

Michael S. <vidphotoguy@yahoo.com>
Reply-To: "Michael S." <vidphotoguy@yahoo.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 8:39 PM

Dear Esteemed Community Planners,

I'm writing you as a citizen of Los Feliz regarding a press release issued by City Councilmember Nithya Raman about the Hollywood Community Plan. In this press release, Councilmember Raman carelessly throws her support behind the height increases on Hillhurst between Los Feliz Boulevard and Franklin Avenue. She says height limits should be increased in our neighborhood "only for projects that demonstrate a substantial commitment to affordable housing" but makes no effort to say who will enforce this guidance, nor what a "substantial commitment" would look like.

Too often, we have seen how up-zoning allows developers to take advantage of neighborhoods, evicting long term renters in affordable units and taxing infrastructure while providing few, if any affordable units. Despite this, the Planning Department and city officials seem unable to come up with any policies which *actually* preserve affordable housing and make Los Angeles more livable. Instead they seem committed to enriching developers at everyone else's expense.

My neighbors and I VEHEMENTLY oppose removing height limits on Hillhurst. We also VEHEMENTLY oppose any new construction without at least one parking space per bedroom. There is already no parking on Los Feliz streets and increasing density without adequate parking will make a bad problem worse. Forcing citizens to stop driving and start taking public transportation is a fantasy.

Michael Sandoval,

Second generation Los Feliz Resident



Planning CPC <cpc@lacity.org>

Changes to Hollywood Community Plan -- Hillhurst Avenue Height Restrictions Los Feliz

1 message

Marjorie Steinberg <steinbergmarjorie@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 1:52 PM

We live in District 4. We oppose the request by our Councilmember seeking to change the provisions of the Plan referenced above as to permitted building height on Hillhurst Avenue. That change was not vetted with the community most affected by it. Input from stakeholders in Los Feliz should be obtained before any such change is adopted by the Planning Commission. Much work went into the Plan by many of our neighbors; it is beyond dismaying to see changes proposed to that Plan without consulting them and other interested parties. Please do not change the tentative plan without giving the community an adequate opportunity to provide input on a change that could ruin our Village.

Marjorie and Mark Steinberg
[2272 West Live Oak Drive](#)
[Los Angeles 90068](#)



Los Feliz and the Hollywood Community Plan Update - request to allow resident input

1 message

Mark Turner <mturner1001@gmail.com>

Wed, Mar 17, 2021 at 2:01 PM

To: contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org, sophia.kim@lacity.org, linda.lou@lacity.org, quetzalli.enrique@lacity.org, cpc@lacity.org

hello,

Recently I learned that the Hollywood Community Plan Update will include steps to eliminate height restrictions in Los Feliz.

And I learned that this plan to change the restrictions was added suddenly, without any significant community input.

As a 17 year resident of Los Feliz I am against the proposed land-use changes.

And I'm angry that they are being fast-tracked without community input into a plan that has been worked on for years, WITH community input.

One of the best parts of this neighborhood is the smaller buildings along the main commercial streets. It would be a shame to change the character of the place without first talking with the people who actually live here.

Please reconsider these changes, and allow the residents of Los Feliz to weigh in on the matter.

thank you,
Mark Turner
Los Feliz Resident



March 17, 2021

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

Melrose Arts District
BID Board of Directors:

RE: CPC-2016-1450-CPU
Hollywood Community Plan Update DRAFT
Community Plan Implementation Overlay DRAFT

Deny Weintraub
President

Sylvia Weintraub
Corporate Secretary

Julian Chicha
Treasurer

Pierson Blaetz
Greenway Arts Alliance/
Melrose Trading Post

Isack Fadlon
Sportie LA

Daniel Farasat
Tiger West Capital

David Hay
Spacegrab.com

Fred Rosenthal
Ametron Audio/Visual

Donald R. Duckworth
Executive Director

Honorable Commissioners,

At their regular meeting on March 12, 2021, The Melrose Arts District BID Board took the following unanimous position regarding CPC-2016-1450-CPU, the Hollywood Community Plan Update "HPCU" and related Hollywood Community Plan Implementation Overlay "CPIO".

URGENCY: The COVID19 pandemic has had severe social, health and economic impacts on our community. Simply put, COVID19 impact recovery must be included as a primary objective for the HPCU and CPIO. We need the HPCU and CPIO to pass quickly and move immediately into implementation.

Critical COVID19 recovery elements for Melrose BID area (Commercial Corridor Area 5) from Fairfax to Highland in the HPCU and CPIO:

- Support as is: Change of zone from C4 to C2
- Support as is: "No Additional off-street automobile parking shall be required when a change of use is made within an existing commercial space."
- Request added, "No additional off-street automobile parking shall be required when an existing commercial building is demolished and rebuilt with equivalent floor area." Why: This is required to replace aging commercial structure inventory, given the current CPIO and HPCU freezes our height limitation.
- Support as is: "Outdoor seating areas shall be excluded from any Ground Floor area limitations."

1934 Wilson Avenue
Arcadia, CA 91006
323.525.0840

HPCU modification request: 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

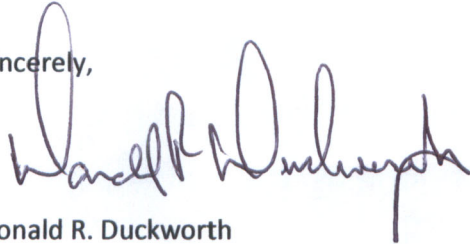
www.melroseartsdistrict.com
FB: @melroseartsdistrict
Tw: @melroseartsdist
Inst: @melroseartsdistrict

and culinary art enterprises involving over 300 alternative and independent small businesses.”

As a final, General Comment: The Melrose BID views expeditious adoption and implementation of the Hollywood Community Plan update with our requests as ESSENTIAL to COVID19 recovery and vitality of Melrose Avenue. As such, the Melrose BID requests that the Planning Department and City Council ensure that the update is consistent with the General Plan Framework as well as the Housing Element of the General Plan. If proposed modifications to the Hollywood Community Plan will not be consistent with those elements, we ask that rather than postpone or delay the update, that inconsistent elements be removed and considered under separate action, or in conjunction with updates to relevant portions of the Framework and Housing Elements of the General Plan.

We appreciate your time and attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald R. Duckworth". The signature is fluid and cursive, with a large initial "D" and "R".

Donald R. Duckworth
Executive Director

Cc: Paul Koretz, Councilmember, Council District 5
Daniel Skolnick, Senior Planning Deputy, Council District 5



No High Rises, Please

1 message

ANADEL BARBOUR <anaschmana@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 4:31 PM

Nithya et al;

I am very disappointed in your recent plan to build Skyscrapers in Los Feliz. You ran a campaign to work WITH the community, yet you are going against it in the worst possible way.

As a Nation, we have endured a lot of Political Trauma over the last 4 years. We do not want to be deceived again. You were voted in for the bettering of our community. Los Feliz does not need density, or skyscrapers. If we residents wanted to live in a city with tall buildings and no views, we would live in cities like New York, Seattle, Chicago or even Downtown Los Angeles. We don't. We live here for a reason.

The Road Diet plan failed miserably. The traffic is worse from it. Density failed miserably. Empty units are everywhere with NO affordable housing. High Rises will be a blight and create more traffic and more housing inequities.

Please, please re-think this idea. You are not working WITH the community, but AGAINST it, the very community that voted for you.

With all sincerity,
Anadel



A More Effective Hollywood Plan

Nicholas Burns III <nkburns3@everyactioncustom.com>

Wed, Mar 17, 2021 at 10:49 PM

Reply-To: nkburns3@gmail.com

To: cpc@lacity.org

Dear City Planning Commission,

I'm writing to offer comment on the proposed update to the Hollywood Community Plan. I'm deeply concerned about our region's affordable housing shortage and its impact on the future of Los Angeles, and disappointed that our city isn't doing enough to encourage strong housing growth at all levels of income.

As you know, Los Angeles is suffering from a severe housing crisis. Longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets, leading to 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.

Building a more equitable and prosperous future requires us to create hundreds of thousands of new homes throughout Los Angeles, especially in job-rich, transit-rich, and high-opportunity areas. While the Hollywood Community Plan update should be a golden opportunity to encourage strong housing growth near Metro and job centers, the current Plan fails to accommodate Hollywood's massive need for housing, and doesn't do enough to encourage affordable housing production. It also fails to address the troubling trend of rent-stabilized housing units in Hollywood being demolished and replaced with hotels.

We can't afford to tinker around the margins: we need a transformative Hollywood Community Plan.

For these reasons, I urge you to incorporate the following amendments to the Plan:

On RC1A, RC1B, and RC2 parcels, allow all-residential projects or residential projects with ground-floor commercial space to be built to a maximum bonus FAR to 9:1. This will ensure that parcels next to Metro stations can accommodate high-density housing containing a significant share of affordable units.

Introduce a parking maximum and a per-space fee on parking facilities within a half-mile radius of the Highland, Vine, and Western Metro stations.

In the Multifamily Residential, Corridors, and Character Residential subareas, ensure that CPIO incentives (e.g. maximum bonus FAR, building height, parking reductions) are equivalent to or better than the Transit-Oriented Communities incentives.

Legalize mass timber construction in downtown Hollywood, where it's currently banned.

A Hollywood Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. It's not too late to get this Plan right.

Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,

Nicholas Burns III

1740 S Westgate Ave Unit H Los Angeles, CA 90025-3792



Planning CPC <cpc@lacity.org>

No heigh increase in Los Feliz

1 message

nathan greno <nathangreno@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 9:53 PM

I'm writing to say, PLEASE NO HEIGHT INCREASE IN LOS FELIZ.

Signed,
Nathan Greno
3645 Lowry Road
Los Feliz 90027

Sent from my iPhone



Planning CPC <cpc@lacity.org>

CD4

Peter Balderas <peterbalderas@aim.com>
To: cpc@lacity.org

Thu, Mar 18, 2021 at 7:27 AM

I am against lifting height restrictions in Los Feliz.

Peter Balderas
Franklin Hills

Sent from my iPhone



Planning CPC <cpc@lacity.org>

Plans for Los Feliz

1 message

Paula Taggart <paula4123@sbcglobal.net>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 4:53 PM

As a long time resident of Los Feliz I do not agree with Nithya Raman's requested changes in height limits and land use in our community. It will change the character of our neighborhoods, increase traffic and air pollution. Los Feliz has a small town vibe within the large city. We don't want to lose that!

Paula Taggart
4123 Tracy St
Los Angeles 90027



Planning CPC <cpc@lacity.org>

Height Restrictions on Hillhurst

1 message

Peter Wishinski <pwishinski@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 9:22 PM

I just heard Nithya supports removing height limits for new construction on Hillhurst. I am very very disappointed and plan to fight any plans that change the small town nature and feel of Los Feliz Village. This is unacceptable!

Sent from my iPhone



Michael Unwin
Plus Development LLC
743 Seward St.
Los Angeles, CA 90038

March 17, 2021

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Hollywood Community Plan Update Comment Letter

Dear Commissioners:

Thank you for the opportunity to comment on the Hollywood Community Plan today. Headquartered in Hollywood, Plus Development is a real estate development management firm specializing in design-oriented projects in the residential, multi-family, commercial / hospitality, creative office and retail sectors. We are passionate about what we do, and we were happy to choose Hollywood for our worldwide headquarters given both the existing excitement and future opportunity of the neighborhood. We have a number of active projects in the Hollywood Community Plan area and we are bullish and confident on the future of Hollywood.

We have been encouraged by the progress being made on the Plan and deeply appreciate your work and staff's work to date.

We do have concerns regarding certain changes proposed recently. We respectfully request that the City Planning Commission revert to the base and bonus FARs proposed in the August 2020 draft of the CPIO, and specifically the following:

- Generally increase base and bonus FARs to allow for the range of projects and products that make Hollywood such a dynamic community
- Increase opportunities and simplify process for outdoor dining
- Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives
- Including an incentive to reduce open space as part of the Additional Incentives
- Requiring the preparation of an economic study justifying any reduction of the FAR in the Regional Center area

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is counterproductive. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood's commercial corridors and should be further incentivized. A major criticism by community groups is the demands that

many projects make to remove restrictions, change zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood

By reverting to the higher base FAR of 4.5:1 proposed in the August 2020 draft of the CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City's much-needed housing stock, but also provide job-generating uses near public transit that align with the City's current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. By allowing more people to live and work in an area with public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan's objectives.

As stakeholders in Hollywood, we appreciate the City's vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.

A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

Thank you for considering these comments, and we urge you to consider these changes and join us in envisioning a Hollywood that continues on its path as a dense, transit oriented economic engine that provides housing and opportunity for all.

Respectfully,



Michael (Mick) Unwin



Hollywood Community Plan

1 message

Ron Ostrow <ostrowland@gmail.com>

Wed, Mar 17, 2021 at 9:44 PM

To: nithya.raman@lacity.org

Cc: contactCD4@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org, sophia.kim@lacity.org, quetzalli.enrique@lacity.org, linda.lou@lacity.org, cpc@lacity.org

Dear Councilperson Raman,

As a long time Los Feliz resident and a former President of the Greater Griffith Park Neighborhood Council (now the Los Feliz Neighborhood Council) I am writing to express my deep distress and opposition to any change to the plan that would allow "Up-Zoning" on Hillhurst Avenue. Aside from the troubling precedent of apparently not seeking neighborhood input prior to your expressing support for this change, I believe that such changes would be detrimental to not only the character and neighborhood quality of Los Feliz, but to livability as well. There is absolutely no need for this type of development in Los Feliz. While there is a housing crisis in Los Angeles, it is quite apparent that multiple new structures are rising all over the city and most of them are now or will continue to be unoccupied.

As a long time resident and community activist, I implore you not to support changing the zoning requirements.

Sincerely yours,

Ron Ostrow



Planning CPC <cpc@lacity.org>

Please do not eliminate height restrictions on Hillhurst in Los Feliz

1 message

Sarah Cronin <sarahlynncronin@icloud.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 8:29 PM

Dear CPC,

I live in Los Feliz and do not want height restrictions on Hillhurst eliminated. One of the great things about Los Angeles is its neighborhoods and eliminating the height restrictions would substantially alter the character and use of Los Feliz. I vote and do not want the height restrictions eliminated.

Thank you,

Sarah Cronin
2426 Ronda Vista Drive
Los Angeles 90027



Hollywood Community Plan

1 message

Schellely Kiah <spkiah@pacbell.net>
Reply-To: Schellely Kiah <spkiah@pacbell.net>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Mar 17, 2021 at 6:37 PM

The City Planning Commission:

I am writing to express my concerns about the Hollywood Community Plan.

-- I am opposed to giving developers more base FAR. It is an incentive for them to demolish existing property.

-- A conditional use permit (CUP) must be required for hotel projects that involve the demolition or conversion of RSO or any other classification of housing. We are in a severe affordable housing dilemma and insipid homelessness!!! One of the conditions should be that all housing units are replaced and RSO units should be replaced with affordable housing.

And finally:

-- Stronger anti-displacement measures must be instituted. When a project involves the demolition of existing housing replacement units **must not** be counted toward affordable housing requirements in the new project. Any requirements for new affordable units in TOC or density bonus projects, must be counted **in addition** to replacement units.

Regards

schhhhhhhh

Schellely Kiah
mobile: 323 810 6643



No to height restrictions being lifted in Los Feliz Village

1 message

steven kilgore <steventoddkilgore@yahoo.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 11:12 AM

Hello:

I do not believe, that Nithya Raman's request to eliminate height restrictions in Los Feliz village represent the feelings of the community and was sent without any input from the residents. Is that really to much to ask? Her approach so far lacks transparency, or community oversight. And gives me great concerns over ethics and corruption. I am completely opposed to her request.

Sincerely Steven Kilgore

Sent from my iPad

March 17, 2021



**SIERRA
CLUB**

Via Email hollywoodplan@lacity.org
cpc@lacity.org

Samantha Millman, Chair
Los Angeles City Planning Commission
200 N Spring St
Los Angeles, CA 90012

Re: Sierra Club Supports the Just Hollywood Plan

Dear Chair Millman and Honorable Members of the Planning Commission:

The Sierra Club writes in support of the Just Hollywood Plan. Specifically, we applaud the plan's promotion of public transit, LED gold standard requirements and electrification for new buildings. Below we have broken down why we support the Just Hollywood Plan.¹

Promote Housing, Not Luxury Commercial Development

Housing is an environmental justice issue as displaced tenants are likely to be pushed outward toward places less served by transit. According a 2019 study by McKinsey Consulting, Hollywood has the greatest affordability gap in the the City of Los Angeles. 66% of households would have to spend over 2/3rds of their income in rent to afford a market rate apartment.² That's why it is so important we do not undermine the successful Transit Oriented Communities program creating affordable housing. We should not give developers increased base zoning rights but rather maintain current base zoning rights and tie increases to the provision of

¹ On March 16, 2021, the Sierra Club's Wildland Urban Wildfire Committee submitted a separate letter addressing the lack of fire prevention and safety measures in the proposed plan. The proposals in that letter should also be made a part of the Hollywood Community Plan.

² Affordable Housing in Los Angeles. McKinsey Global Institute. November 2019. Page 16. <<https://www.mckinsey.com/~media/mckinsey/industries/public%20and%20social%20sector/our%20insights/affordable%20housing%20in%20los%20angeles%20delivering%20more%20and%20doing%20it%20faster/mgi-affordable-housing-in-los-angeles-full-report-vf.pdf>>

affordable housing. While we support the reduction of the base FAR from the previous proposal to the current one, it will still mean **more** luxury commercial development like offices and hotels, and less affordable housing, publicly accessible open space, and historic preservation, a profoundly unjust outcome. **We need an intersectional approach to housing, transit, and environmental justice, including strong environmental protections, affordable housing incentives, a hotel CUP, and protections for renters in the plan. Hollywood residents cannot afford to wait.**

Encourage Transit, and More Sustainable Buildings

The proposed Community Plan Implementation Ordinance before you contains **no environmental mitigation measures³ rather** than encouraging more sustainable buildings, transit passes, native trees and other environmental measures in Hollywood. The Community Plan text itself provides few environmental measures with teeth to ensure a sustainable Hollywood. This is especially concerning because the City is likely to rely on the Community Plan's mitigation measures for the purposes of mitigation required by the California Environmental Quality Act, with a reduced ability for the public to challenge projects to be more sustainable. Hollywood, with some of the best transit access to LA, adjacent to some of the nation's largest parks, should be the model for encouraging use of our transit infrastructure and of sustainability.

Accordingly, we believe the plan should require commercial projects and projects seeking discretionary FAR increases to provide a minimum level of sustainability measures below:

1. For new building construction, 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.
2. The project encourages the use of non-vehicular forms of transportation through a transportation demand management plan that includes, at a minimum, free transit passes and parking cash-out among mechanisms to ensure project employees use transit rather than cars to go to work.
3. The project contributes to Los Angeles's sorely neglected urban forest by incorporating trees in the development and 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.
4. 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.


³ Appendix A, page 94 of the Proposed CPIO says that it is a "Placeholder for Environmental Standards that will be noted in the forthcoming environmental impact.

<https://planning.lacity.org/odocument/2c1f2047-5c97-42e3-9bb2-3c2b2399e221/Exhibit_D.pdf>

A similar system is already working in Santa Monica to encourage more sustainable projects in its downtown core. Additionally, we urge that the landscaping requirements of the proposed Hollywood Plan should be refined. The plan does not in most cases (including for Publicly Accessible Open Space and streetscaping in the public right of way) require the planting of native or drought-tolerant plants.⁴ In contrast, the Expo Line Transit Neighborhood Plan requires that 80% of landscaping for public open space be drought tolerant, 100% must be drought-tolerant in the public right of way, and 70% must be so for landscaping done on private property. These standards for native/drought tolerant plants should be reflected in the Hollywood Community Plan.

Hollywood can shine, Commissioners. Please support a Just, Sustainable Hollywood.

Respectfully Submitted



Barbara Hensleigh, Chair
Central Regional Group
Angeles Chapter
Sierra Club

CC: Councilmembers O'Farrell, Koretz, and Raman

⁴ See page 78, 86, 120 of Expo Line TNP. <https://clkrep.lacity.org/onlinedocs/2018/18-0437_ORD_186402_12-26-2019.pdf>



SUNRISE MOVEMENT LA

Samantha Millman, Chair
Los Angeles City Planning Commission
200 N Spring St
Los Angeles, CA 90012

Dear Chair Millman and Honorable Members of the Planning Commission,

The Sunrise Movement writes to enthusiastically support the Just Hollywood Plan. Specifically, we applaud the plan's promotion of public transit, placing people close to where they work, and connecting the community with the natural environment. We believe that Hollywood, which includes one of the nation's largest urban parks and among the best transit access in the City of Los Angeles, is a perfect place to embrace such a superb plan. Below we have broken down why we support the Just Hollywood Plan.

Promote Housing, Not Luxury Commercial Development

Housing is an environmental justice issue as displaced tenants are likely to be pushed outward toward places less served by transit. According a 2019 study by McKinsey Consulting, Hollywood has the greatest affordability gap in the the City of Los Angeles. 66% of households would have to spend over 2/3rds of their income in rent to afford a market rate apartment.¹ That's why it is so important we do not undermine the successful Transit Oriented Communities program creating affordable housing. We should not give developers increased base zoning rights but rather maintain current base zoning rights and tie increases to the provision of affordable housing. A radical increase of the the base FAR to 4.5 (over doubling it in some areas) will mean **more** luxury commercial development like offices and hotels, and less affordable housing, publicly accessible open space, and historic preservation, a profoundly unjust outcome. **We need an intersectional approach to housing, transit, and environmental justice, including strong environmental protections, affordable housing incentives, a hotel CUP, and protections for renters in the plan. Hollywood residents cannot afford to wait.**

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The proposed Community Plan Implementation Ordinance before you contains **no environmental mitigation measures² rather** than encouraging more sustainable buildings, transit passes, native trees and other environmental measures in Hollywood. The Community Plan text itself provides few environmental measures with teeth to ensure a sustainable Hollywood. This is especially concerning because the City is likely to rely on the Community Plan's mitigation measures for the purposes of mitigation required by the California

¹ Affordable Housing in Los Angeles. McKinsey Global Institute. November 2019. Page 16.

<<https://www.mckinsey.com/~/media/mckinsey/industries/public%20and%20social%20sector/our%20insights/affordable%20housing%20in%20los%20angeles%20delivering%20more%20and%20doing%20it%20faster/mgi-affordable-housing-in-los-angeles-full-report-vf.pdf>>

² Appendix A, page 94 of the Proposed CPIO says that it is a "Placeholder for Environmental Standards that will be noted in the forthcoming environmental impact. <https://planning.lacity.org/odocument/2c1f2047-5c97-42e3-9bb2-3c2b2399e221/Exhibit_D.pdf>

Environmental Quality Act, with a reduced ability for the public to challenge projects to be more sustainable. Hollywood, with some of the best transit access to LA, adjacent to some of the nation's largest parks, should be the model for encouraging use of our transit infrastructure and of sustainability.

Accordingly, we believe the plan should require commercial projects and projects seeking discretionary FAR increases to provide a minimum level of sustainability measures below:

1. For new building construction, 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.
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3. The project contributes to Los Angeles's sorely neglected urban forest by incorporating trees in the development and 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.
4. 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.

A similar system is already working in Santa Monica to encourage more sustainable projects in its downtown core.³ Additionally, we urge that the landscaping requirements of the proposed Hollywood Plan should be refined. The plan does not in most cases (including for Publicly Accessible Open Space and streetscaping in the public right of way) require the planting of native or drought-tolerant plants.⁴ In contrast, the Expo Line Transit Neighborhood Plan requires that 80% of landscaping for public open space be drought tolerant, 100% must be drought-tolerant in the public right of way, and 70% must be so for landscaping done on private property. These standards for native/drought tolerant plants should be reflected in the Hollywood Community Plan.

Hollywood can shine, Commissioners. Please support a Just, Sustainable Hollywood.

Thank you,

Sunrise Movement Los Angeles

³ See the Link for Environmental Standards in Santa Monica's Downtown Community Plan <<https://tiny.cc/smda>>

⁴ See page 78, 86, 120 of Expo Line TNP. <https://clkrep.lacity.org/onlinedocs/2018/18-0437_ORD_186402_12-26-2019.pdf>



Planning CPC <cpc@lacity.org>

Hollywood zoning plan - YES!

Taylor Chapman <tchapman@me.com>

Tue, Mar 16, 2021 at 9:44 PM

To: cpc@lacity.org

Cc: contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org, priya.mehendale@lacity.org, sophia.kim@lacity.org, linda.lou@lacity.org, quetzalli.enrique@lacity.org

Team, yes. Just yes. Let's upzone the fuck out of this city and undo decades of injustice to the inhabitants - all of us.

Some loser is attempting to sew chaos and interrupt plans. This person does NOT speak for the community. The city needs to be a city for the majority, not a small and hateful minority.

<https://www.lfia.org/last-minute-hollywood-community-zoning-plan-threatens-los-feliz/>

Do everything you can. We all, collectively, need this kind of action and forward thinking.

Sent from my iPhone



Opposing lifting height limitations on Hillhurst

1 message

Tess Lynch <tess.lynch@gmail.com>
To: cpc@lacity.org

Wed, Mar 17, 2021 at 10:59 AM

Hello,

I'm a Los Feliz resident (we bought our home in 2012) writing in regards to the HCPU height limits. I voted for Nithya Raman because I believed that she would listen to our community and tackle the crisis facing our unhoused neighbors without catering to the same developers who have created a glut of unaffordable housing. Today, I am deeply disappointed that no community input was requested or heard in advance of this proposition.

I oppose lifting these restrictions for the following reasons:

- Lifting the height restrictions endangers the small businesses in Los Feliz village, making the parcels more appealing to the developers who have created unaffordable housing and replaced independently-owned retail with big-box chains.
- After almost a decade in our neighborhood, I have little to no faith that developers will honor a commitment to construction that is truly affordable, having witnessed false promises/payoffs in many mixed-use developments in my immediate vicinity. We have a glut of vacant luxury units in our neighborhood, as well as empty plots that developers have let languish for years.
- I believe that a better solution is to make our existing residential units affordable -- TRULY AFFORDABLE -- and to implement a vacancy tax immediately on all existing residential units before changing zoning restrictions. We need to incentivize developers and apartment owners to fill every vacancy before even considering rezoning.

Over the past few years, as homelessness has increased exponentially, I have seen many new developments built in my neighborhood. All of them promise to allocate many affordable units, and all of them default on their promises. Meanwhile, there exists a mystifyingly large number of vacant units in these new buildings. Or maybe it's not mystifying at all -- they are not at all in line with what Los Angelenos can afford. The answer to our problems cannot be solved by new developments, but only by developers having to reckon with their own greed. These developers should not be enlisted to solve the problems they created by building more giant structures that will remain empty. They should be taken to task and forced to pay for every apartment that is not filled, with incentives to help solve the housing crisis by making their residences affordable and available to the citizens who need them.

We cannot -- and do not need to -- wait for high-rises to be built to house our unhoused neighbors. These units exist already and require much less money to rehab than new units do to build. We should not displace small businesses and existing housing to build more of the same kinds of structures that have negatively impacted our community.

Respectfully,

Tess Lynch



Please don't destroy Los Feliz Village

1 message

ted rohrlich <ted.rohrlich@gmail.com>

Wed, Mar 17, 2021 at 9:03 PM

To: cpc@lacity.org

Cc: priya.mehendale@lacity.org, sophia.kim@lacity.org, linda.lou@lacity.org, quetzalli.enrique@lacity.org, contactCD4@lacity.org, nithya.raman@lacity.org, sarah.tanberg@lacity.org

Amending the Hollywood Plan cavalierly, at the last moment, and without neighborhood consultation, to eliminate height limits along Hillhurst Avenue would be an ill-considered and potentially tragic mistake.

Clearly, Los Angeles needs to grow its housing upward and it needs more affordable housing. But that growth should be concentrated, as planners have long advocated, along significant public transportation corridors.

Nearby Sunset Boulevard and Hollywood Boulevards are major corridors with mass transit infrastructure. Hillhurst is one of the city's few village-like, pedestrian-friendly streets of restaurants, cafes and small shops and does not have mass transit options.

Would you destroy Leimert Park or Larchmont Village--examples of the city's few other pedestrian-friendly meccas?

Please don't destroy Los Feliz Village which has Hillhurst as its heart.

Thank you for considering my point of view.

Ted Rohrllich
1944 Rosalia Rd.
LA 90027
213-839-0789

THE POST GROUP PRODUCTION SUITES

March 16, 2021

Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, California 90036
Email: cpc@lacity.org

Re: Hollywood Community Plan Update Comment Letter

Dear Commissioners:

The Post Group is a longtime property owner and business in Los Angeles, with numerous properties within the Hollywood Community Plan area. We strongly believe in the future of a Hollywood community that can live up to the acclaimed identity the area has developed over the last century. As both property owners and members of the entertainment industry, we have a uniquely strong connection to the area, and a strong desire to see Hollywood continue its evolution into a truly world class residential neighborhood, international tourist hub, and the economic engine of the region.

We have been encouraged by the progress being made on the Plan and deeply appreciate your work and staff's work to date.

We do have concerns regarding certain changes proposed recently. We respectfully request that the City Planning Commission revert the base and bonus FARs proposed in the August 2020 draft of the CPIO, and specifically the following:

- Generally increase base and bonus FARs to allow for the range of projects and products that make Hollywood such a dynamic community
- Increase opportunities and simplify process for outdoor dining
- Allow projects that incorporate a range of affordability levels, including workforce, moderate-income, or above-moderate income housing to qualify for the Additional Incentives
- Including an incentive to reduce open space as part of the Additional Incentives, as previously included in the August CPIO
- Requiring the preparation of an economic study justifying any reduction of the FAR in the Regional Center area

The reduction of the base FAR as a means to promote housing development – and, in particular, the production of affordable housing units in Hollywood – is a step backwards. The proposed reduction of the base FAR does not account for the type of density that already exists in Hollywood's commercial

corridors and should be further incentivized. A major criticism by community groups is the demands that many projects make to remove restrictions, change zoning and otherwise include a growing list of exceptions to account for the market realities that support additional density past the current zoning restrictions. The Plan should be updated to avoid such future entitlements and should reflect a new, growing Hollywood. We believe the proposed updates in February 2021 were responsive to this vision of Hollywood.

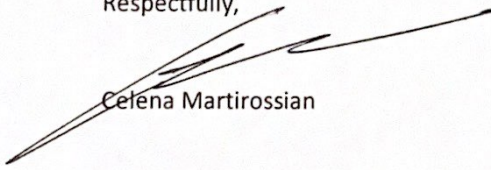
By reverting to the higher base FAR of 4.5:1 proposed in the August CPIO, property owners and developers can create projects within the Regional Center at higher densities. With most of the Regional Center flanked by two Metro stations, the area is ideal for encouraging high-density transit orientated developments. The development of underutilized parcels into high-density housing and mixed-use developments would not only add to the City's much-needed housing stock, but also provide job-generating uses near public transit that align with the City's current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. By allowing more people to live and work in an area with public transit, a base FAR of 4.5:1 is much better suited to achieve the new Community Plan's objectives.

As stakeholders in Hollywood, we appreciate the City's vision for this area and inclusion of certain measures to ensure that Hollywood develops in a sustainable and healthy manner, particularly the increased Site Plan Review threshold. The Affordable Housing Incentive Bonuses in the CPIO should be further revised to ensure that property owners and developers are building projects that sustain and support healthy communities. The focus on housing is critical, but healthy communities require a range of housing affordability levels and other amenities such as open space, job centers, and infrastructure.

A singular focus on affordable units ignores economic reality and would have a punitive effect on developers who are committed to build more affordable housing units, which are desperately needed in Hollywood and the City of Los Angeles. If the City Planning Commission is committed to retaining the reduction in base FAR, then an economic study must be prepared to justify the affordable housing incentives proposed to show that these measures will actually be successful.

Thank you for considering these comments, and we urge you to consider these changes and join us in envisioning a Hollywood that continues on its path as a dense, transit oriented economic engine that provides housing and opportunity for all.

Respectfully,



Celena Martirosian

March 17, 2021

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

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

Members of the City Planning Commission,

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

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

HOUSING

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

No Increase of Base Floor Area Ratio (FAR)

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

The Plan Must Include Real, Enforceable Anti-Displacement Measures

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

Replacement Units Must Not Be Counted Toward Affordable Requirements

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

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

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

The HCPU Must Mandate Verification of Affordable Units by Inspection

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

Ongoing Failure to Comply with Housing Element

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

URBAN FOREST/AIR QUALITY/URBAN HEAT ISLAND EFFECT

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

GENERAL PLAN MONITORING REQUIREMENTS

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

20+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

I'm writing to offer comment on the proposed update to the Hollywood Community Plan. I'm deeply concerned about our region's affordable housing shortage and its impact on the future of Los Angeles, and disappointed that our city isn't doing enough to encourage strong housing growth at all levels of income.

As you know, Los Angeles is suffering from a severe housing crisis. Longstanding constraints on denser housing production, combined with a lack of sufficient funding for affordable housing production and preservation, have led to a massive housing shortage. This has made Los Angeles one of the nation's most unaffordable housing markets, leading to 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.

Building a more equitable and prosperous future requires us to create hundreds of thousands of new homes throughout Los Angeles, especially in job-rich, transit-rich, and high-opportunity areas. While the Hollywood Community Plan update should be a golden opportunity to encourage strong housing growth near Metro and job centers, the current Plan fails to accommodate Hollywood's massive need for housing, and doesn't do enough to encourage affordable housing production. It also fails to address the troubling trend of rent-stabilized housing units in Hollywood being demolished and replaced with hotels.

We can't afford to tinker around the margins: we need a transformative Hollywood Community Plan.

For these reasons, I urge you to incorporate the following amendments to the Plan:

On RC1A, RC1B, and RC2 parcels, allow all-residential projects or residential projects with ground-floor commercial space to be built to a maximum bonus FAR to 9:1. This will ensure that parcels next to Metro stations can accommodate high-density housing containing a significant share of affordable units.

Introduce a parking maximum and a per-space fee on parking facilities within a half-mile radius of the Highland, Vine, and Western Metro stations.

In the Multifamily Residential, Corridors, and Character Residential subareas, ensure that CPIO incentives (e.g. maximum bonus FAR, building height, parking reductions) are equivalent to or better than the Transit-Oriented Communities incentives.

Legalize mass timber construction in downtown Hollywood, where it's currently banned.

A Hollywood Community Plan update that incorporates these policies will help advance our common goals of housing affordability, socioeconomic equity, economic prosperity, and environmental sustainability. It's not too late to get this Plan right.

30+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

As a Los Feliz stakeholder for over 30 years, we are concerned the proposed Hollywood Community Plan Update has undergone last-minute changes that have not been properly or adequately reviewed by the community at large.

Unfortunately City Councilmember, Nithya Raman, has requested changes that have had little or no community input, nor accurately represent the viewpoints of the residents she purportedly represents. If the plan is to be modified from the previous versions that did receive input, then the community should be allowed to make their thoughts known before any final approval is given.