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If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

January 17, 2020

Jason McCrea
Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
jason.mccrea@lacity.org

To whom it may concern,

We are writing to you in support of the proposed 276-unit mixed-use development, including 13 dedicated Very Low Income units, at 1546 North Argyle Avenue, CPC-2016-3742-GPA-VZC-HD-DB-MCUP-SPR/ENV-2016-3743-EIR. It will also include 24,000-27,000 square feet of neighborhood-serving commercial retail and restaurant uses. We urge the city to permit incentives including a 14% Density Bonus, a 20% increase in allowable FAR and a 20% reduction in the project's rear yard.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing. By creating new housing in this neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing. It is one block away from the Metro Red Line, which runs from North Hollywood to downtown LA, as well as DASH Hollywood. There is frequent Metro bus service 3 blocks away. Line 180/181 runs between Hollywood and Pasadena, and Line 217 runs between Los Feliz and Fox Hills. Both lines stop at numerous transit, medical, and retail centers. There are an elementary school, middle school, and high school all within one mile, and many desirable neighborhood amenities such as restaurants, retail, and theaters are in easy walking and bicycling distance.

It is great to see the developer using the Density Bonus program to bring both market rate and badly needed affordable housing to the city. Affordable housing programs that depend on a percentage of new construction being affordable need a lot of new construction to have an impact, and the city should work to increase the number of developers using the Density Bonus.

Best Regards,



Tami Kagan-Abrams
Abundant Housing LA Projects Director

January 16, 2020

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

Re: Modera Argyle Project
1546 N. Argyle Avenue and 6624 W. Selma Avenue
Case Nos. CPC-2016-3742-GPA-VZC-HD-DBMCUP-SPR; VTT-74566
CEQA No. ENV-2016-3743-EIR
OPPOSED

Members of the City Planning Commission,

I am writing to voice my opposition to the project referenced above.

The requested General Plan Amendment, Vesting Zone Change and Height District Change should not be granted because the project does not comply with the Housing Element of the General Plan.

Also, the previously certified EIR is severely deficient in the following respects:

- Transportation: The authors claim compliance with the RTP/SCS even though GHG emissions in Los Angeles have risen sharply since 2013 and are now higher than ever.
- Public Services/Police: The figures cited for crime in the Hollywood area are grossly inaccurate. This section falsely claims that crime in Hollywood is lower than the citywide average. In fact, it is significantly higher.
- Other CEQA/ Solid Waste: The EIR falsely claims that the project is compliant with AB 939, which requires cities to recycle 50% of their solid waste. This project will be served by RecycLA, which is currently not even recycling 35% of solid waste collected.

These issues were communicated to City staff prior to certification of the EIR. The CPC cannot make a finding that the project was adequately assessed in the EIR.

Please see my further comments below for more details.

Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068
cmaddren@gmail.com

MODERA ARGYLE PROJECT COMMENTS

Requested Actions

The applicant is requesting:

- A General Plan Amendment to the Hollywood Community Plan to re-designate the Site from Commercial Manufacturing to Regional Center Commercial land use;
- A Vesting Zone Change and Height District Change from [Q]C4-1VL-SN to C4-2-SN to remove an existing “Q” Condition

Neither the General Plan Amendment nor the Zone Change and Height District Change should be granted. The Project is not consistent with the Housing Element of the General Plan or the Hollywood Community Plan, both of which state as objectives that the City provide housing for residents at all income levels. This Project continues the City's practice of approving projects in which 90% or more of the units are for Above Moderate Income households, and 10% or less are for Moderate Income, Low Income and Very Low Income households. In this case the project description does not even specify the number of VLI units to be included, but merely says five (5) percent of the permitted base density would be set aside for Very Low Income Households.

This City's ongoing practice of approving projects that provide 90% of new housing for Above Moderate Income households, and 10% or less for Moderate Income, Low Income and Very Low Income households has led to a severe housing imbalance which is threatening the City's stability. The City has failed for years to fulfill the Housing Element's goal of providing housing for residents at all income levels, and has also failed to fulfill the State's RHNA allocations for Middle Income, Low Income, and Very Low Income households.

The General Plan Amendment, the Zone Change and the Height District Change should be denied.

EIR Is Deficient in Numerous Respects

Transportation

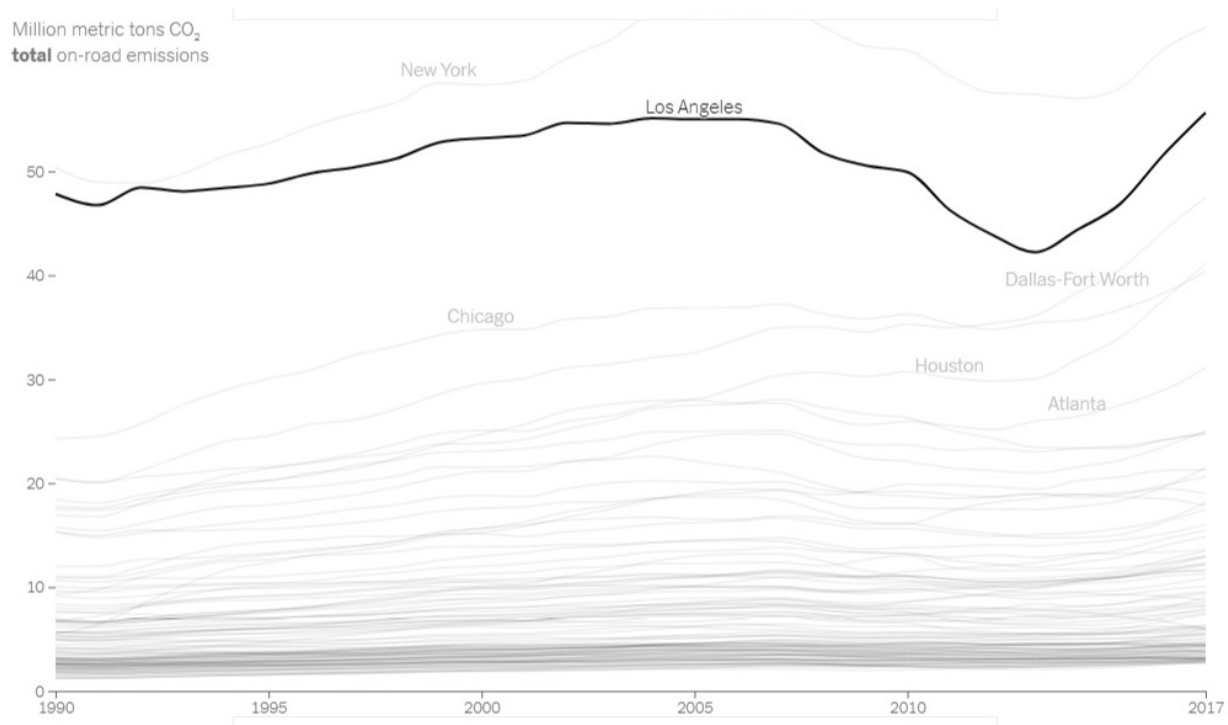
The EIR acknowledges that the City has moved away from LOS as a method for analyzing transportation impacts, but has not yet adopted a VMT threshold or corresponding methodology. The City currently has no methodology for analyzing transportation impacts.

The City has not conducted required monitoring to assess progress in reducing vehicle trips or GHG emissions.

The City claims that the project qualifies as Transit-Oriented Development, but has made the same claim about every major real estate project it has approved in the last 10 years. In spite of this, transit ridership on both Metro and DOT lines has been falling steadily. Metro ridership is currently lower than it was in the mid-80s, in spite of the fact that LA County (the area served by Metro) has added over a million residents during that period. A 2018 report from the UCLA Institute of Transportation Studies (Falling Transit Ridership) shows that transit ridership in LA continues to fall while per capita car ownership has increased substantially since 2000.

Thousands of residential units have been added to the Hollywood area in the past 10 years, but the Metro lines serving the area have seen steady declines in ridership.

The authors of the EIR claim compliance with the RTP/SCS, but they cite only the objectives which support their case, and ignore those which the project does not comply with. Data from Boston University's Database of Road Transportation Emissions shows that in Los Angeles CO2 on-road emissions have risen dramatically since 2013, and are higher now than any time in last 50 years.



Graph from NYT article, 10/10/19, based on data from Boston University's Database of Road Transportation Emissions.

This shows that in spite of the City's claims of compliance with the RTP/SCS, the City has completely failed to achieve SB 375's goal of reducing CO2 emissions.

Public Services: Police

The statistics cited by the EIR are substantially incorrect and do not represent that actual crime rate in the Hollywood area. For some reason Table IV.F.2-1, 2018 Part I Crimes—Hollywood Area and Citywide, cites the COMPSTAT Hollywood Area Profile dated 12/01/18 and the COMPSTAT Citywide Profile dated 12/08/18. Since these only show crime stats through early December, they do not give a complete picture of crime states Citywide or in Hollywood for the year 2018. Here is the crime data as presented in the EIR:

	<i>Crimes</i>	<i>Population</i>	<i>Crimes Per 1,000 Persons</i>	<i>Crimes Per Capita</i>
Hollywood	5,838	300,000	19.5	0.0195
Citywide	119,214	4,007,147	29.8	0.0298

The COMPSTAT Citywide and Hollywood Profiles dated 12/29/18 show significantly higher totals for the City and for Hollywood at the end of 2018. *[See Attachment A.]*

Hollywood 6,332

Citywide 127,609

Also, the population figure of 300,000 given for the Hollywood area in Table IV.F.2-1 is grossly inflated. The Hollywood Gower EIR, adopted earlier this year, states in the Public Services - Police section that the area's population is 165,000.

Was the higher population figure used deliberately to reduce the per capita total for crime in Hollywood? It is absolutely false that crime per capita is lower in Hollywood than for the City overall. The crime rate in Hollywood is substantially higher than the Citywide average.

The EIR grossly misrepresents the crime rate in the Hollywood area, and falsely claims that it is lower than the Citywide average. This misrepresentation makes it impossible for citizens reviewing the EIR to assess what the Project's actual impacts would be on crime.

Other CEQA Considerations: Solid Waste

In the section dealing with solid waste, the EIR states, "The Project would also comply with AB 939, AB 341, AB 1826....".

The Project will not comply with AB 939, which requires California municipalities to divert at least 50% of solid waste to recycling. The Project will be served by the RecycLA program. Recent amendments to RecycLA contracts have set a target of 35% diversion by 2023. The City is a long way from diverting 50% of solid waste to recycling.

All major projects approved in LA in recent years claim compliance with AB 939, when in fact none of them are. This will lead to significant cumulative impacts due to an increasing reliance on landfills for solid waste disposal. The EIR's claims regarding existing landfill capacity are inaccurate. In fact, landfill capacity is shrinking throughout the State, and creating new landfills is increasingly difficult. According to the attached article from industry periodical Waste Dive [See Attachment B], the Pacific region only has 17 remaining years of landfill capacity. At the same time, the entire State is experiencing a recycling crisis, with insufficient infrastructure to achieve State-mandated recycling goals. Therefore approval of this project in addition to several other major projects currently proposed will lead to significant negative cumulative impacts with regard to solid waste.

Steven D. Lurie
CAPT-I
March 18, 2018
August 5, 2018
June 9, 1997



BRIEF

US landfill capacity to drop 15% over next 5 years

By Kristin Musulin

Published May 8, 2018

Dive Brief:

- Over the next five years, total U.S. landfill capacity is expected to decrease by more than 15%, according to data from Waste Business Journal. An estimated 10-15 years of landfill capacity will remain by 2021.
- Solid Waste Environmental Excellence Protocol (SWEEP) leaders Jim Thompson and Rob Watson cite China's volatile import regulations as a major driver for this decrease in capacity, noting that "the bottom has dropped out of the recycling market."
- The data shows the Northeast is most heavily affected, with an annual rate of loss of 5%, while the West is the least affected, with an annual rate of loss of 1.5%.

Region	Remaining Capacity (years)	Annual rate of loss
Northeast	8	-5.0%
Southeast	14	-2.5%
Midwest	11	-4.0%
Western	22	-1.5%
Pacific	17	-1.9%
USA	15	-2.6%

January 17, 2020

Hagu Solomon-Cary, City Planner
200 North Spring Street
Los Angeles, CA, 90012
hagu.solomon-cary@lacity.org

To whom it may concern,

We are writing to you in support of the proposed affordable 150-unit project at 407-413 E. 5th Street, CPC-2019-4298-DB-SPR- SIP. We urge the city to find the project Categorically Exempt from the provisions of CEQA, and to approve the project with the following Affordable Housing Incentives:

- A 58% increase in the Floor Area Ratio (FAR), not to exceed 4.73:1, in lieu of the otherwise allowable maximum of 3:1 FAR
- Reduce the minimum required Usable Open Space by 51% to permit a minimum of 7,350 square feet in lieu of the otherwise 15,000 square feet

The greater Los Angeles region is facing a severe housing shortage, and this project will provide much needed affordable housing. Because historical racial and economic segregation have contributed to the homelessness crisis we are facing, affordable housing is urgently needed in every community throughout Los Angeles. Creating new housing in Skid Row will help house people in need of homes. However, Abundant Housing LA simultaneously advocates for prioritizing affordable housing construction in wealthy, exclusionary neighborhoods. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is close to transit options, with 7 bus lines stopping down the block and across the street. These routes collectively run between Downtown and West LA, Santa Monica, Koreatown, Montebello, South Los Angeles, and Long Beach, with stops at multiple transit, medical, retail, and employment centers. The project itself will also provide a total of 7,350 square feet of open space including a courtyard, roof decks, private open space, a recreational room and a multi-purpose room.

It is great to see the developer using Affordable Housing Incentives to bring badly needed affordable housing to the city. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the incentives and zoning change, and find the project Categorically Exempt from the provisions of CEQA.

Best Regards,



Tami Kagan-Abrams
Abundant Housing LA Projects Director



Department of City Planning

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

January 21, 2020

TO: City Planning Commission

FROM: Hagu Solomon-Cary, City Planner

TECHNICAL MODIFICATION TO THE PROJECT ANALYSIS AND CONDITION SECTIONS IN THE RECOMMENDATION REPORT FOR CASE NO. CPC-2019-4298-DB-SPR-SIP; 407 - 413 EAST 5TH STREET

The Department of City Planning staff respectfully requests that the City Planning Commission considers the following technical modification to the Project Analysis- Background section and Condition section on pages A-1 and C-1, respectively, of the Recommendation Report related to Item No. 9 on the meeting agenda at the City Planning Commission meeting of January 23, 2020. This technical modification is necessary to appropriately contextualize the proposed development as part of the replacement housing project for the Barclay Hotel and ensure that the project is appropriately conditioned with regards to the replacement plan executed by the CRA/LA. All other Recommended Actions are to remain as presented in the Recommendation Report.

Deleted text is shown in ~~strike through~~. Added text is show in underline.

On Page A-1 of the Project Analysis Section

Background

Site Description

The project site is a relatively flat, rectangular-shaped property that consists of three rectangular-shaped lots, which a street frontage of approximately 75 feet on the north side of East. 5th Street and a lot size of approximately 13,442 square feet (Exhibit B). The site is currently occupied by a surface parking lot and a one-story building for the use of Harvest Rock Foundation Azusa Lighthouse Mission Church that will be demolished as part of the proposed project.

The site has been identified as the location for replacement units under the "Replacement Housing and Relocation Assistance Plans for the Barclay Hotel" ("Approved Replacement Housing Plan") approved and required by the CRA/LA, a Designated Local Authority on August 1, 2019, as

recommended in its Memorandum dated August 1, 2019 titled "Approved Replacement Housing Plan for the Morrison Hotel and Replacement Housing/Relocation Assistance Plans for the Barclay Hotel." The Approved Replacement Housing Plan is included in the case file for reference.

On Page C-1 of the Conditions of Approval Section

4. ~~**Changes in Restricted Units.**~~ ~~Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Sections 12.22 A.25 and Government Code Section 65913.4 (d)(1).~~ The Project shall demonstrate compliance with the requirements of "Replacement Housing Plan for the Morrison Hotel" and "Replacement Housing and Relocation Assistance Plans for the Barclay Hotel" ("Approved Replacement Housing Plan") both approved and required by the CRA/LA, a Designated Local Authority on August 1, 2019, as recommended in its Memorandum dated August 1, 2019 titled "Approved Replacement Housing Plan for the Morrison Hotel and Replacement Housing/Relocation Assistance Plans for the Barclay Hotel."



Planning CPC <cpc@lacity.org>

Fwd: Case # AA-2014-4808-PMLA-1A2014-

Courtney Schoenwald <courtney.schoenwald@lacity.org>

Mon, Jan 13, 2020 at 4:48 PM

To: Planning CPC <cpc@lacity.org>

Cc: Ken Rodenbush <kenrodenbush@pacbell.net>

Hello,
Below is a comment from the public for the Commission.
Thank you,

**Courtney Schoenwald**

City Planner, Valley Specific Plan Maintenance Unit

Los Angeles City Planning

6262 Van Nuys Blvd

Van Nuys, CA 91401

Planning4LA.org

T: (818) 374-9916 | F: (818) 374-9955

----- Forwarded message -----

From: **Ken Rodenbush** <kenrodenbush@pacbell.net>

Date: Mon, Jan 13, 2020 at 1:55 PM

Subject: Case # AA-2014-4808-PMLA-1A2014-

To: courtney.schoenwald@lacity.org <courtney.schoenwald@lacity.org>

Cc: Emma.Howard@lacity.org <Emma.Howard@lacity.org>

To Whom it May Concern:

I am a resident at [3900 Hollyline Ave.](#) and have been for the past 36 years.

My wife and I raised our family here and have always enjoyed the quite, rural feeling of Hollyline Ave.

The fact that it is a dead end street with few homes on large lots, give us a feeling of living in the country while being only minutes from Ventura Blvd.

Hollyline Ave. has no sidewalks, no curbs and no street lights. We as residents and many others living on Hollyline want to keep it like it is. Without the recommended and/or required street improvements being requested by the city.

As members of, Friends & Neighbors of Hollyline Avenue, we support the developers of Hollyline Bliss in their development of the property at [3915 Hollyline Ave.](#) We also stand with them in objecting to the changes in street lighting, street curbs and sidewalks.

These changes are and would be total inconsistence with Hollyline Avenue as it is now and has always been.

1/14/2020

City of Los Angeles Mail - Fwd: Case # AA-2014-4808-PMLA-1A2014-

Thank you for your consideration. I can be reached at 818 990-1038 or kenrodenbush@pacbell.net

Kindest Regards,

Kenneth and Martha Rodenbush

Friends & Neighbors of Hollyline Avenue

Sent from [Mail](#) for Windows 10

DAY OF HEARING SUBMISSIONS